

## **EXHIBIT 5**

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

- - - - - :  
JOHNNY M. HUNT, :  
:  
Plaintiff, : CASE NO.  
:  
vs. : 3:23-cv-0000243  
:  
SOUTHERN BAPTIST CONVENTION, :  
GUIDEPOST SOLUTIONS LLC and :  
EXECUTIVE COMMITTEE OF THE :  
SOUTHERN BAPTIST CONVENTION :  
:  
Defendant. :  
:  
- - - - - :

DEPOSITION OF RUSSELL HOLSKE

DATE: February 1, 2024  
TIME: 9:37 a.m.  
LOCATION: Veritext Legal Solutions  
1250 I Street, NW  
Suite 901  
Washington, DC 20005

REPORTED BY: Constance H. Rhodes  
Reporter, Notary

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1 ALSO PRESENT (Via Zoom)

2 Scott Murray

Kathy Klein

3 Ella Merritt

Jon Anderson

4 Johnny Hunt

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P R O C E E D I N G S

VIDEOGRAPHER: Good morning. Today's date is February 1, 2024. And this is the video-recorded deposition of Dr. -- pardon -- Mr. Russell Holske, Jr., in the matter of Johnny M. Hunt versus Southern Baptist Convention. We are in Washington, D.C., and we're now on the record. The time is 9:37.

Court reporter, please swear in the witness and you can start.

WHEREUPON,

RUSSELL HOLSKE, JR

called as a witness, and having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFF

BY MR. MACGILL:

Q Sir, good morning. Would you state your name for the record, please.

A Russell Holske.

Q And how do you pronounce your last name?

A Holske.

Q Holstein.

A Holske.

1 Q Holske?

2 A H-O-L-S-K-E.

3 Q Thank you. So Mr. Holske, you are  
4 appearing pursuant to notice of deposition in this  
5 case?

6 A Yes.

7 Q All right. And you understand that this  
8 is a lawsuit brought by Pastor Johnny M. Hunt  
9 against Southern Baptist Convention, Guidepost  
10 Solutions, LLC, and the Executive Committee of the  
11 Southern Baptist Convention.

12 A Yes.

13 Q Tell us about your educational  
14 background, if you would, sir.

15 A I received a bachelor of science degree  
16 from Northeastern University in Boston,  
17 Massachusetts. I earned a master of business  
18 administration from St. Leo University in Florida.

19 Q What year was your bachelor's awarded?

20 A 1989.

21 Q And when was your MBA received?

22 A 2013.

1 Q How are you employed, sir.

2 A I am a senior managing director for  
3 Guidepost Solutions, LLC, based out of Washington,  
4 D.C.

5 Q How long have you been in that role,  
6 sir?

7 A Since -- I've been in that role since  
8 August 2nd, 2021.

9 Q And were you employed prior to  
10 Guidepost? How long have you been employed by  
11 Guidepost?

12 A That would be two years and six months  
13 to the day.

14 Q So you began your employment with  
15 Guidepost on August 2nd, 2021?

16 A Correct.

17 Q And where were you employed prior to  
18 that, sir?

19 A Estee Lauder Asia-Pacific.

20 Q And what did you do for Estee Lauder?

21 A I was the regional director of  
22 investigations, security, and trademark protection



1 for Estee Lauder based in Hong Kong, responsible  
2 for the Asia-Pacific region, which included 13  
3 country offices.

4 Q How long did you have that role, sir?

5 A I was employed by Estee Lauder from  
6 November of 2019 until July 2021.

7 Q Where were you employed prior to Estee  
8 Lauder?

9 A I was employed by the US Department of  
10 Justice Drug Enforcement Administration.

11 Q And what did you do for the drug  
12 enforcement administration.

13 A At the time of my retirement I was the  
14 regional director for the Far East region based on  
15 Bangkok, Thailand, responsible for the country  
16 offices from Beijing south to Wellington, New  
17 Zealand.

18 Q And what was your respons- -- how many  
19 years were you employed by the DEA, sir?

20 A I was employed by the DEA for 32 years.

21 Q When did you begin your role with the  
22 DEA?

1           A       I began as a investigative aide in 1987  
2 while attending Northeastern University.

3           Q       So did you -- you were employed for a  
4 couple years prior to your graduation at  
5 Northeastern University; is that right?

6           A       Correct. I attended the DEA training at  
7 the FBI Academy from September through December,  
8 1989, at which time I became -- I was awarded the  
9 position of special agent, federal investigator.

10          Q       Beginning in the year 1989?

11          A       Correct.

12          Q       Now, sir, with respect to the matters  
13 involved in this case, did you serve as the lead  
14 investigator for the portion of a report issued by  
15 Guidepost that is related to the plaintiff, Pastor  
16 Johnny Hunt?

17          A       I wouldn't term my role as lead  
18 investigator, but I was one of the primary  
19 investigators.

20                   MR. MACGILL: All right. So let me hand  
21 you some interrogatory answers.

22                   If I could take a look at tab five.

1                   (HOLSKE Exhibit Number 1 was marked for  
2                   identification.)

3       BY MR. MACGILL:

4           Q       Sir, I'm going to hand you what I've  
5       marked as Exhibit 1. Have you seen these  
6       interrogatory answers before?

7                   MR. KLEIN: Feel free to look at the  
8       entire document in order to answer that question.

9       BY MR. MACGILL:

10          Q       And sir, I'm referring to page 2 of  
11       responses to interrogatory one. Do you see your  
12       name referenced there, Russell Holske, Jr.?

13          A       I do.

14          Q       And your role is described here as the  
15       lead investigator in the report related to the  
16       plaintiff.

17                   Do you see that?

18          A       Yes.

19          Q       Is that a fair statement, sir, in your  
20       mind?

21          A       Now that I'm reading this report, I see  
22       that my partner, Samantha Kilpatrick, is also

1 named as a lead investigator. I'm comfortable  
2 with that as.

3 Q So is it fair to say that based on your  
4 work in this case, you yourself served as a lead  
5 investigator for the portion of the report related  
6 to Pastor Johnny Hunt?

7 MR. KLEIN: Objection. Asked and  
8 answered. You can answer.

9 THE WITNESS: A lead investigator. Not  
10 the investigator.

11 BY MR. MACGILL:

12 Q So a lead is a fair description?

13 A Correct.

14 Q And is it also a fair description, as  
15 far as you were concerned, that Samantha  
16 Kilpatrick was also a lead investigator for a  
17 portion of the report related to the plaintiff,  
18 Pastor Johnny Hunt?

19 A Yes.

20 Q And did you -- is it fair for the  
21 company or for the person executing these  
22 interrogatories under oath, that is Anthony

1 Collura, to represent that you, sir, for your part  
2 drafted the portion of the report related to  
3 Pastor Johnny Hunt?

4 A I am one of the draftees, yes.

5 Q And, you know, so the words are also  
6 fair that the Samantha Kilpatrick was described as  
7 having drafted a portion of the report related to  
8 Pastor Johnny Hunt as well?

9 A Yes.

10 Q All right. So it was the two of you,  
11 sir, was it not, that drafted the portion of the  
12 Guidepost report related to the plaintiff in this  
13 case pastor, Pastor Johnny Hunt?

14 MR. KLEIN: Objection as to form, but you  
15 can answer.

16 THE WITNESS: Yes.

17 BY MR. MACGILL:

18 Q Yes. Okay. Now, sir --

19 MR. KLEIN: I didn't mean to interrupt  
20 you. I just noticed something, Rob. I'm going  
21 to -- are these exhibits going on the Zoom screen,  
22 do we know? And I ask for one reason. Part of the

1 document you just showed -- and you did not discuss  
2 it with the client, so it's totally fine -- does  
3 reveal some names of witnesses and survivors -- or  
4 witnesses I should say. So if we're going to use  
5 this document as part of the exhibits, I would just  
6 ask -- and I can work with Patrick -- just to make  
7 sure those names, just two or three, we can discuss  
8 off the record are just redacted if this is going to  
9 be shared as part of the exhibits. That's all I  
10 would ask.

11 MR. MACGILL: Not at this time. We will  
12 not share these exhibits at this time on the screen.

13 MR. KLEIN: Thank you.

14 MR. MACGILL: Unless we -- we will let you  
15 know in advance if we're going to.

16 MR. KLEIN: I appreciate that. Thank you.  
17 BY MR. MACGILL:

18 Q So sir, just to round out -- strike  
19 that.

20 I want to make sure we understand the  
21 metes and bounds, so to speak, of your involvements  
22 in this matter.

5           A       I'm sorry.  Could you repeat that  
6   question?

7 Q Is it also true, sir, that you yourself  
8 were involved in the decision to include REDACT  
ED  
allegations against Pastor Johnny Hunt in  
10 the Guidepost report?

12 Q Is it fair to say you were involved in  
13 the decision, sir? To repeat: You were involved  
14 In the decision?

16 Q Yes. And the decision that you were  
17 involved in, based on your work in this case, was  
18 to include REDACTED allegations against  
19 Pastor Johnny Hunt in the report from Guidepost?

21 Q Okay. And again, if we look at the  
22 interrogatories, what you testified is consistent

1 with what's in those interrogatory answers, right?

2 A I haven't read this entire document.

3 Q Okay. Not seen Exhibit 1 before; is  
4 that correct?

5 A I don't recall seeing this exhibit.

6 Q Now the person who executed these  
7 interrogatories is a person by the name of Anthony  
8 Collura. Do you know Mr. Collura?

9 A Yes, I do.

10 Q Is he the chief operating officer of  
11 Guidepost at the present time?

12 A Yes.

13 Q Was he the chief operating officer at  
14 Guidepost at the time that the Guidepost report  
15 was published?

16 A Yes.

17 Q Sir, I'm going to ask you some basic  
18 background questions pertaining to the engagement  
19 of Guidepost. How were you involved in the  
20 engagement with -- between Guidepost and the SBC?

21 MR. KLEIN: Objection as to form. You can  
22 answer.



1                   THE WITNESS: I'm not sure I understand  
2 your question. I'm sorry.

3 BY MR. MACGILL:

4           Q       Do you understand that there was an  
5 engagement letter executed between Guidepost and  
6 the SBC?

7           A       Yes. But I was not involved in that.

8           Q       Okay. When did you first become  
9 involved in this matter?

10          A       Once the engagement was secured, I guess  
11 you could say, secured would be the right word --  
12 agreed upon, or signed, I was asked to be a member  
13 of the team.

14          Q       At some point did you see with your own  
15 eyes the engagement letter?

16          A       I don't remember seeing the engagement  
17 letter.

18          Q       Okay. Let me ask -- I'm going to hand  
19 you the engagement letter and we'll make this  
20 Exhibit 2.

21                   (HOLSKE Exhibit Number 2 was marked for  
22 identification.)

1 BY MR. MACGILL:

2 Q And my first question, sir, is have you  
3 seen the engagement letter before?

4 A No.

5 Q How did you know -- strike that.

6 How did you come to understand what you  
7 were to do in connection with the investigation in  
8 this matter?

9 A We at Guidepost had meetings among the  
10 team where we were provided an explanation as to  
11 where our role was. And the portions on page 5 of  
12 the document you handed me, under section 3.1,  
13 specifically and as directed by the SBC Motion,  
14 Guidepost will investigate. There are five  
15 bullets and then a paragraph regarding an audit of  
16 procedures and actions of the credentials  
17 committee. Those were clearly explained by the  
18 team -- to the team.

19 Q By whom, sir?

20 A I don't remember.

21 Q Were you in a roomful of people when  
22 this was explained or was this a one-off meeting

1 with you individually?

2 A No. It would have been a group meeting.  
3 I don't recall the date. I don't recall who was  
4 present. But I do remember at some point in time  
5 one of the principals for the investigation would  
6 have talked about these elements of our role.

7 Q Who were the principals involved in the  
8 investigation?

9 A Krista Tongring; our CEO Julie  
10 Myers-Wood. Those two.

11 Q What was Krista Tongring's role in this?

12 MR. KLEIN: Objection as to form. You can  
13 answer.

14 THE WITNESS: I don't know if there's a  
15 term. She would be the project manager for lack of  
16 a better term.

17 BY MR. MACGILL:

18 Q When you met with her did you understand  
19 essentially she was going to function as the  
20 project manager for this investigation?

21 A I did.

22 Q All right. And who did you report to in

1 connection with your work at Guidepost on this  
2 report that is the subject of this lawsuit?

3 A Krista Tongring and, at times, Julie  
4 Wood.

5 Q So your direct report was Krista  
6 Tongring?

7 A Yes.

8 Q And is she your boss generally speaking?

9 A No. And that's why I pause --

10 Q Who is your boss generally speaking?

11 MR. KLEIN: I just want to make sure he  
12 finished the answer because you ask the question,  
13 Robert. You were still answering.

14 THE WITNESS: I don't report to Krista.  
15 In these engagements when someone is deemed the  
16 project manager, that's who you report to. But it's  
17 engagement by engagement.

18 BY MR. MACGILL:

19 Q I see. So generally speaking, is it  
20 fair to say that you report to the project manager  
21 in a particular investigation?

22 A That would be fair to say.

1           Q     Okay. Now, just to get a better  
2 understanding of what you understood your job was  
3 to be as one of the lead investigators, did you  
4 understand that your job was going to include the  
5 five bullet points on the second page of this  
6 engagement letter, Exhibit 2?

7           A     Yes.

8           Q     And the scope of the engagement was  
9 described to you by the spoken word; is that  
10 right?

11          A     Yes.

12          Q     You were not provided this written  
13 document, Exhibit 2?

14          A     I was provided these bullets at a  
15 certain time, a date I don't recall, on a template  
16 for all interviews. So for each and every  
17 interview there was a template, and it included  
18 these bullet points so that we could explain to  
19 each witness the scope of our role at Guidepost  
20 Solutions in support of this engagement.

21          Q     Okay. Now what else was on that  
22 template for the interviews in addition to these

1 five bullet points?

2 A The witness's -- the witness's ability  
3 to request anonymity. That's -- that's -- that's  
4 one of the elements I can remember. All questions  
5 about whether they -- the witness is a member of a  
6 Southern Baptist Church, a sentence along the  
7 lines of asking them if they have any relevant  
8 information to share related to those five  
9 bullets.

10 Q Who prepared the template?

11 A I don't know.

12 Q You did not prepare the template?

13 A I did not.

14 Q What did you do to prepare for giving  
15 testimony to the court and jury today?

16 A I prepared reports related to this  
17 matter.

18 Q Any other documents that you reviewed?

19 A Other than things directly related to  
20 this matter, no.

21 Q When you say what other things related  
22 to this matter, other than Guidepost?

1           A       I reviewed emails, investigator  
2 interview reports, text messages. I think that  
3 encompasses everything that I reviewed.

4           Q       Which -- which text messages did you  
5 review?

6           A       My own.

7           Q       And they were text messages that you  
8 sent to whom?

9           A       Text messages between myself and members  
10 of the team such as Samantha Kilpatrick, Krista  
11 Tongring, Julie Myers-Wood, and witnesses.

12          Q       And witnesses?

13          A       Such as       REDACTED       .

14          Q       Okay. What's the volume of text  
15 messages approximately you reviewed in preparation  
16 to give your testimony?

17          A       I couldn't put a number on it.

18          Q       Do you know your -- were the text  
19 messages, did they have Bates numbers on them?

20          A       Bates number? What do you mean?

21          Q       Do you understand what Bates numbers  
22 are?

1           A       I don't. That's why I asked.

2           Q       So in the litigation process, and  
3 perhaps this was the case at the DOJ or the DEA,  
4 when documents are produced in a proceeding there  
5 are Bates numbers which are legend -- they are  
6 numbers that are put as a legend on a document.

7           A       I'm not aware of that.

8           Q       Not aware of that. Okay. So -- but in  
9 any event, how long did it take you -- how much  
10 time did you spend reviewing documents to prepare  
11 to give testimony today?

12          A       Several hours.

13          Q       And when -- during what period of time  
14 did you make that review?

15          A       Over the last week.

16          Q       Okay. Now, did you meet with counsel as  
17 well?

18          A       I did.

19          Q       When?

20          A       Last Thursday. Give me just a moment.  
21 Tuesday of this week.

22          Q       Who did you meet with on Thursday?



1           A       Mr. Klein and Alex Otchy.

2           Q       Okay. The two gentleman here in the  
3 room with us?

4           A       Yes. And also, I'm not sure who the  
5 third gentleman was last Thursday, but a member of  
6 Mintz and Gold. And then on Tuesday, Mr. Steven  
7 Mintz participated.

8           Q       With Mr. Klein?

9           A       Mr. Klein and Mr. Otchy.

10          Q       Anyone else on the meeting Tuesday?

11          A       No.

12          Q       How long was the meeting on the Tuesday?

13          A       Approximately four hours.

14          Q       And where was the meeting?

15          A       Online.

16          Q       Was the meeting Tuesday of last week --  
17 I'm sorry -- Thursday of last week online also?

18          A       Yes.

19          Q       And when did you first meet in person  
20 with the lawyers that are in the room today?

21          A       This morning about 8:30.

22          Q       Did you review any documents this

1 morning?

2 A I did not.

3 Q Did you review the template that you  
4 utilized in connection with the interviews as a  
5 part of your preparation?

6 A It would have been embedded into an  
7 interview that I would have reviewed. So yes a  
8 blank template, no, but it would have been  
9 embedded into one of the templates, at least one  
10 of the interview templates.

11 Q I want to ask you some questions about  
12 the engagement and the work that was done. You  
13 understood that Guidepost Solutions, LLC, had been  
14 engaged by the Southern Baptist Convention through  
15 the leadership of the task force that had been  
16 assembled; is that right?

17 A Could you say that again.

18 Q Who did you understand you were working  
19 for in connection with this case?

20 A Our client was the Southern Baptist  
21 Convention.

22 Q And did you report to anybody

1 specifically at the Southern Baptist Convention?

2 A No.

3 Q Others in your company did?

4 MR. KLEIN: Objection as to form. You can  
5 answer.

6 THE WITNESS: I don't know.

7 BY MR. MACGILL:

8 Q So you weren't involved in the  
9 communications about your work with SBC?

10 A None whatsoever.

11 Q The engagement letter says our client --  
12 strike that.

13 Our client in this matter will be the task  
14 force of the SBC. Is that consistent with your  
15 understanding?

16 MR. KLEIN: Can you just -- I'm sorry, can  
17 you just point to the paragraph number you are  
18 referring, Rob, so I can follow along.

19 MR. MACGILL: It's paragraph 2.1.

20 MR. KLEIN: Thank you.

21 THE WITNESS: I'm sorry. What was the  
22 question?

1 BY MR. MACGILL:

2 Q It says in Section 2.1, our client in  
3 this matter will be the task force of the SBC. Is  
4 that your understanding?

5 A Now that I'm reading it.

6 Q But you didn't have that understanding  
7 coming into this matter today?

8 A Directly, no?

9 Q Did you understand your company was  
10 going to take guidance from the SBC in connection  
11 with your work?

12 MR. KLEIN: Objection as to form. You can  
13 answer.

14 THE WITNESS: I took guidance from the  
15 project manager.

16 BY MR. MACGILL:

17 Q You didn't have any understanding of how  
18 the SBC would, if at all, guide the work of  
19 Guidepost; is that fair?

20 A Correct.

21 Q Who was the -- who is the president of  
22 SBC at the time you did your work?

1           A       I'm not sure.

2           Q       Are you aware of the fees charged by  
3 your company in connection with this work?

4           A       I am not.

5           Q       Do you have an estimate of what your  
6 company Guidepost charged for its work?

7           A       I do not.

8           Q       Not even a general estimate?

9           A       I'm sorry. I do not.

10          Q       Was it millions of dollars?

11               MR. KLEIN: Objection. Asked and  
12 answered. You can answer.

13               THE WITNESS: I don't know.

14 BY MR. MACGILL:

15          Q       Don't know? So is it fair to say that  
16 you operated in your job with no orientation to  
17 the finances of the engagements of your company;  
18 is that fair?

19               MR. KLEIN: Objection as to form.

20               THE WITNESS: That's fair.

21 BY MR. MACGILL:

22          Q       Okay. You just do investigations,

1 right?

2 A Correct.

3 Q Okay. Now, with respect to this work,  
4 was this -- could you tell us how many hours you  
5 spent in connection with your work in this case?

6 A I couldn't.

7 Q Did you understand that the Guidepost  
8 engagement was to provide an independent  
9 investigation?

10 A Yes.

11 Q Tell the jury here what you mean when  
12 you say that your company engaged in doing an  
13 independent investigation.

14 MR. KLEIN: Objection. I would just note  
15 and I'm sure it's high habit from you, Rob, but your  
16 said the jury. I just want -- and I'm only saying  
17 that I want the witness to know there's no jury  
18 present today. And so I just wanted to note that.

19 BY MR. MACGILL:

20 Q Yeah. Let me make sure you understand.  
21 We will play your testimony in the court and jury  
22 in this case, so I want you to understand that

1 your testimony is just as if you were in the  
2 courtroom today. Do you understand that?

3 A Yes.

4 Q And do you understand that we have the  
5 right to play this videotape of your deposition to  
6 a court and jury to the extent the judge  
7 authorizes it. Do you understand that?

8 A Yes.

9 Q And you understand you gave an oath at  
10 the beginning of this proceeding, right?

11 A I understood I took an oath, yes.

12 Q And you understood that oath was just as  
13 important to you in your truthfulness as if you  
14 were the courtroom live, right?

15 A Yes.

16 Q Okay. So when I make reference to --  
17 when I'm asking you about explaining to the court  
18 and jury, I want you to understand, it's with the  
19 intention we will be playing this for the court  
20 and jury. Fair enough.

21 A Yes.

22 Q Now, let's just look a little bit at the

1 details here. Strike that.

2 I'd like for you to explain in your own  
3 words to this court and to this jury what you meant  
4 when you said that your company, Guidepost, was  
5 going to conduct an "independent" investigation?

6 A I didn't make that statement.

7 Q You agreed with me, sir, that your  
8 company was to conduct an independent  
9 investigation, right?

10 A I didn't get a chance to answer your  
11 question.

12 Q All right. Did your -- okay. Let me  
13 ask it. Did your company conduct an independent,  
14 underscore independent, investigation or not?

15 A Yes.

16 Q Okay. Now, when you agreed with my  
17 question that your company did in fact conduct an  
18 independent investigation, what did you mean by  
19 the term independent?

20 A Without influence from a third party.

21 Q Okay. Let's talk a little bit about  
22 without influence from a third party. So



1 third-party influence would include the SBC,  
2 right?

3 A Correct.

4 Q It would include any influence  
5 especially or in particular by a particular  
6 witness, right?

7 A We -- it was discussed among our team  
8 that our role was to gather facts and to come up  
9 with a report that would be independent, and would  
10 not be changed or altered by anybody else. It  
11 would be Guidepost Solutions' investigative  
12 report.

13 Q Sir. What I'm going to do, I'm going to  
14 ask the court reporter to read your answer back.  
15 I'd like to listen to it, and I've got a follow-up  
16 question. Okay?

17 (Whereupon, the Reporter read the record  
18 as requested.)

19 BY MR. MACGILL:

20 Q You heard that answer?

21 A I'm sorry?

22 Q Did you hear the court reporter?

1           A       I heard what she read.

2           Q       And among -- she read a portion of your  
3       testimony that this was going to be an independent  
4       report that would be "not be changed or altered by  
5       anyone." You heard that portion of your answer?

6           A       Correct.

7           Q       Now, relative to not being changed or  
8       altered by anyone -- that is, your report -- is it  
9       fair to say that from the Guidepost perspective,  
10      to be independent that your report could not be  
11      changed by any particular witness, right?

12          A       Witnesses provide the facts to us. We  
13      write the report. So it does take into account  
14      witness input.

15          Q       But not influenced in particular or  
16      strongly by any particular witness's preferences  
17      right?

18                   MR. KLEIN: Objection as to form you can  
19      answer.

20      BY MR. MACGILL:

21          Q       Let me ask a better question.

22          A       We make the ultimate decision at

1 Guidepost on what goes into the report.

2 Q Right. And it's also fair to say and  
3 you'll confirm to the jury now, sir, to be  
4 independent you understood at all times that  
5 Guidepost was not to be influenced in particular  
6 by the preferences of any witness. Fair  
7 statement?

8 A Factual input received from witnesses  
9 would be a part of what we reported.

10 Q But to be independent Guidepost could  
11 not be influenced by the preferences of any  
12 particular witness in order to be independent.

13 A A witness would not be able to determine  
14 the ultimate end product of the report.

15 Q But again, I just want to make sure. I  
16 just want to make sure you are going to be able to  
17 tell the jury right now under oath that  
18 Guidepost agrees -- strike that.

19 I want you to be able to confirm as one of  
20 the lead investigators that you aren't going to be  
21 influenced by the preferences of any particular  
22 witness. Fair statement?

1           MR. KLEIN:  Objection.  Asked and  
2 answered.  You can answer again.

3           THE WITNESS:  I'm sorry.  Could you repeat  
4 that.

5 BY MR. MACGILL:

6           Q     Be happy to.  I'm going to ask the court  
7 reporter to read it back and then let's see if you  
8 can answer it.

9                     (Whereupon, the Reporter read the record  
10 as requested.)

11           Let me start over.  Sir, so I want to  
12 make sure you can confirm to us now, you for your  
13 part as a lead investigator, you are not going to  
14 be influenced in your work by the preferences of  
15 any one witness.  Is that fair?

16           MR. KLEIN:  Objection.  You can answer.

17           THE WITNESS:  I have a problem with the  
18 word preferences because we sought review by a  
19 survivor to make sure that survivor was comfortable  
20 with the -- or was comfortable with the accuracy of  
21 what her experience was.

22

1 BY MR. MACGILL:

2 Q So you would be deferring to the  
3 "survivor" preferences in your report; is that  
4 right?

5 MR. KLEIN: Objection as to form. You can  
6 answer.

7 THE WITNESS: We sought to ensure complete  
8 accuracy of what was going in the report by what the  
9 survivor told us.

10 BY MR. MACGILL:

11 Q But you were -- but did you in any  
12 respect yield, so to speak, to the preferences of  
13 REDACTED ?

14 MR. KLEIN: Objection as to form. I  
15 believe he's answered this two or three times.

16 THE WITNESS: Ultimately, it was our  
17 decision what went into that report.

18 BY MR. MACGILL:

19 Q So to be independent you did not, at any  
20 time, to the best of your knowledge as you sit  
21 here today, not yield, so to speak, to the  
22 preferences of REDACTED ?

1 MR. KLEIN: Objection as to form. It's  
2 the fourth time you've asked it, Rob. I'll let him  
3 answer, of course, again, but then I think we're  
4 going to have to move on. But you can answer.

5 THE WITNESS: Ultimately, Guidepost  
6 Solution decided the content of the report.

7 BY MR. MACGILL:

8 Q Okay. I want to ask you about REDACT  
9 REDACTED Did you -- for your part, sir, as lead  
10 investigator, did you agree to preferences  
11 expressed by REDACTED in any way in connection  
12 with the report?

13 MR. KLEIN: Objection as to form. You can  
14 answer.

15 THE WITNESS: REDACTED provided  
16 input as to -- as to what -- what was going to be  
17 reported, but ultimately Guidepost Solutions decided  
18 what went into that report.

19 BY MR. MACGILL:

20 Q Sir, I'm going to use a phrase and I'm  
21 going to ask you if you understand the phrase  
22 because I'm going to ask you some questions about

1 it. Do you understand in human interactions what  
2 it means when you say that I have a arm's length  
3 relationship with someone? Do you understand that  
4 generally?

5 A Yes.

6 Q Tell the court what you understand an  
7 arm's length relationship to be.

8 A A relationship with boundaries.

9 Q In what sense?

10 MR. KLEIN: I'm going to object as to  
11 form. It calls for a legal conclusion, but he can  
12 answer.

13 THE WITNESS: There are certain parts in a  
14 relationship where there are boundaries that aren't  
15 crossed I guess.

16 BY MR. MACGILL:

17 Q All right. And in your -- and in your  
18 work as a lead investigator, what boundaries would  
19 you not cross with a witness?

20 A Allowing a witness to write the report  
21 on behalf of Guidepost Solutions.

22 Q Any others?

1           A       Asking a witness -- asking or providing  
2       untruthful information that we accept as truth.

3           Q       Any other boundaries?

4           A       It's a very general question. I'm  
5       really not sure what else you are looking for.

6           Q       Well, in terms of arm's length  
7       relationship, did you keep an arm's length  
8       relationship with all the witnesses that you cited  
9       in the Guidepost report?

10               MR. KLEIN: Objection as to form. You can  
11       answer.

12               THE WITNESS: Can you be more specific?

13       BY MR. MACGILL:

14           Q       Yes. I want to use just arm's length  
15       relationship in the way that you've described it.  
16       Okay? You've described it in your -- in your  
17       understanding an arm's length relationship is a  
18       relationship that has certain boundaries. Do you  
19       recall that testimony?

20           A       Yes.

21           Q       You've also confirmed that in connection  
22       with your work that you wouldn't want -- one



1 boundary would be you wouldn't want the witness to  
2 write the report, right?

3 A Correct.

4 Q Another boundary you wouldn't want the  
5 witness to provide untrue statements, right?

6 A Right.

7 Q Would another boundary be that you don't  
8 want the witness to provide bias and unsupported  
9 allegations?

10 A I wouldn't want that. It wouldn't  
11 impact what we ultimately decide to put in the  
12 report.

13 Q But would that be a boundary, that you  
14 wouldn't want the witness to supply biased or  
15 unsupported allegations?

16 A Again, if there's bias in reporting by a  
17 witness, it doesn't impact ultimately what goes  
18 into the report.

19 Q All right. Now let's -- I want to ask  
20 you generally. How many witnesses did you  
21 interview that were actually included in your  
22 report?

1           MR. KLEIN:  Objection.  Are you talking  
2   just the Johnny Hunt section or the entirety of the  
3   report, just to focus the witness.

4           MR. MACGILL:  The Johnny Hunt section.

5           THE WITNESS:  How many witnesses?

6   BY MR. MACGILL:

7           Q     Yes.

8           A     Approximately seven.

9           Q     Okay.  Can you tell us who they were?

10          MR. KLEIN:  Objection.  Some of them are  
11   witnesses who are not named in the report and so he  
12   can obviously provided ones that are named in  
13   public, but some of the witnesses were not  
14   identified.  So I would ask if you want those names  
15   then we would ask quickly for Johnny Hunt to be --  
16   so I'll leave it to you then, Rob, if you want those  
17   names --

18          MR. MACGILL:  If those witnesses are not  
19   -- you've not designated the witness names.  It's  
20   attorney client or attorney AEO or confidential.  
21   There's been no designation by you at any time on  
22   the witnesses that support the report.

1           MR. KLEIN: That's not true. The  
2 witnesses were redacted from the report. They were  
3 not listed -- some of the witnesses. And I'm only  
4 talking about the ones who were not named, and we  
5 know the ones who were named. The ones who are not  
6 named in the report are some of the people that I  
7 imagine he's about to respond in answer to your  
8 question.

9 BY MR. MACGILL:

10           Q All right. Let's name those that are  
11 public first. Then we'll go to the others. Who  
12 are the names -- who are the witnesses that you  
13 named in the report associated with the Johnny  
14 Hunt allegations?

15           A Roy Blankenship.

16           Q Okay. Who else?

17           A And Dr. Hunt.

18           Q Any others?

19           A No.

20           Q So you didn't list any other -- you said  
21 there were seven witnesses and there were only two  
22 that were referenced in the report, Dr. Hunt and

1 Mr. Blankenship?

2 A The survivor and husband were not named  
3 in the report.

4 Q Any other witnesses?

5 A Three other witnesses are not named in  
6 the report.

7 Q And you want Mr. -- you want Pastor Hunt  
8 not to hear these other three witnesses?

9 A Correct.

10 Q All right. So Pastor Johnny, if you  
11 would, I'd ask you to turn the volume off on your  
12 phone.

13 MR. KLEIN: I thought there was a breakout  
14 that we could do for Johnny just to ensure he will  
15 not hear the testimony.

16 MR. MACGILL: He can do that or do the  
17 volume. Either one.

18 MR. KLEIN: I'd prefer the breakout room  
19 if it won't take up too much time.

20 (Pause for technical adjustment.)

21 BY MR. MACGILL:

22 Q Now, sir, when you are ready, we'll

1 start up again.

2 A I'm ready.

3 Q Now your lawyers and you are not willing  
4 to share the identities of witnesses associated  
5 with your work to Pastor Johnny Hunt; is that  
6 right?

7 A I think that's what my attorney just  
8 said.

9 Q I'd like you to tell the court why it is  
10 that you are unwilling to share the names of  
11 witnesses with Pastor Johnny Hunt. Tell us why.

12 MR. KLEIN: Objection. You can answer.

13 THE WITNESS: To protect the identity of  
14 witnesses that asked for anonymity.

15 BY MR. MACGILL:

16 Q Why do you -- why do you, sir, from the  
17 Guidepost standpoint publish a report to the world  
18 pertaining to Pastor Johnny Hunt on May 22nd of  
19 2022, yet you refuse, as you sit here this  
20 morning, to provide Pastor Johnny Hunt with the  
21 identity of anonymous witnesses that are  
22 associated with allegations pertaining to him?

1           A       I don't know how to answer that  
2 question.

3           Q       Well, just as a matter of fundamental  
4 fairness, sir, let's just make sure you admit some  
5 things as we get started here. You'll admit now,  
6 without any equivocation on your part, that your  
7 company published to the world your report on  
8 May 22nd, 2022.

9                   MR. KLEIN: Objection as to form.

10                  THE WITNESS: The report was published.

11 BY MR. MACGILL:

12           Q       To the world. To the world. Wasn't it,  
13 sir?

14                   MR. KLEIN: Objection as to form.

15                  THE WITNESS: I don't know what you mean,  
16 to the world.

17 BY MR. MACGILL:

18           Q       You put it on your website, did you not?  
19 Guidepost put this report with Johnny Hunt's name  
20 in it and allegations associated with him on your  
21 website on May 22, 2022, did it now?

22                   MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: Guidepost published the  
3 report on May 22nd, 2022.

4 BY MR. MACGILL:

5 Q And you knew they were going to do so at  
6 the time that you were served as a lead  
7 investigator, right?

8 A Did I know the exact date? I don't  
9 know.

10 Q Do you know how many people -- how many  
11 thousands of people, sir, looked at the report  
12 that was posted by your company on your website?

13 A I do not.

14 Q You never were told how many thousands  
15 of people looked at that particular report?

16 A I was not.

17 Q But in any event, as you sit here today,  
18 you know without any doubt, sir, that your company  
19 on May 22, 2022, posted a report pertaining to  
20 your investigation, including allegations  
21 associated with the Pastor Johnny Hunt, right?

22 A Correct.

1           Q     Now, as you sit here right now with your  
2 lawyers -- two of them here, some of them in New  
3 York -- with respect to your lawyers you are  
4 refusing, sir, to let Pastor Johnny Hunt know the  
5 identity of three people who you interviewed  
6 pertaining to his allegations. Is that right?

7           MR. KLEIN: Objection as to form. I'm the  
8 one who made the objection. The witness did not  
9 make the objection. I \*\* logged the objection by a  
10 court order that said witnesses were attorney's eyes  
11 only. It was my -- you can ask the question, Rob,  
12 but I want to make clear for the record that it was  
13 my -- it was my objection.

14 BY MR. MACGILL:

15           Q     You are refusing, are you not, sir, to  
16 provide Pastor Johnny Hunt with the identity of  
17 these three witnesses, are you not?

18           A     I am not providing those names. It is  
19 not my decision.

20           Q     You are deferring to the executives of  
21 your company and the lawyers in New York City  
22 employed by your company; is that right?



1 MR. KLEIN: Objection as to form. You can  
2 answer.

3 THE WITNESS: My lawyer.

4 MR. KLEIN: And I just want to be clear  
5 that he's not revealing any attorney-client  
6 communication which he cannot and will not do, and I  
7 know you are not asking him to do.

8 MR. MACGILL: No. We're not asking that.

9 MR. KLEIN: Thank you.

10 BY MR. MACGILL:

11 Q But in any event, whether you have been  
12 instructed by lawyers or not, your company is  
13 taking the position -- I'm not asking about lawyer  
14 communications -- Guidepost will not reveal the  
15 names of these three witnesses to Pastor Johnny  
16 Hunt; is that right?

17 A I don't know.

18 Q Now, what are the names of the three  
19 witnesses, sir?

20 A REDACTED

1

3           Q     Okay.   Now, you are saying that three  
4     people, these three witnesses, provided you  
5     information for your report -- for the Guidepost  
6     report; is that right?

7           A     Correct.

8           Q     Did you rely on the information they  
9     provided?

10          A     Did I rely upon it?

11          Q     Yes.

12          A     It was utilized in the report.

13          Q     How was the information from  
14     REDACTED     utilized in the report?

15          A     It was explained in the report what that  
16     witness told us.

17          Q     What did that witness tell you?

18          A     These three witnesses provided varying  
19     degrees of information related to what they  
20     understood regarding this incident. I would have  
21     to see the report in front of me. I haven't  
22     committed it exactly to memory what I was told, so

1 I would have to see it.

2 Q Did any one of these -- did REDACTED  
3 have any firsthand information pertaining to the  
4 incident?

5 A Firsthand, he was not -- no, he was not  
6 present on July 25th, 2010.

7 Q What was the source of his information  
8 about the incident?

9 MR. KLEIN: Objection. You can answer if  
10 you know.

11 THE WITNESS: A conversation that he had  
12 with REDACTED . A conversation or  
13 conversations that he had the REDACTED .

14 BY MR. MACGILL:

15 Q So in terms of your own work as an  
16 investigator, you understood that there were  
17 credibility issues -- to repeat -- credibility  
18 issues based on your experience on the information  
19 that REDACTED gave to you, right?

20 A No.

21 Q As an investigator, sir, if somebody's  
22 requesting that they remain anonymous, doesn't

1 that suggest to you as an investigator, sir, based  
2 on more than 30 years of experience that that may  
3 not -- that may impact the credibility of that  
4 particular witness?

5 A Not particularly, no. Witnesses ask for  
6 confidentiality for a variety of reasons,  
7 including retaliation, their own safety, a variety  
8 of reasons.

9 Q Let's talk about you as a lead  
10 investigator and whether you had other obvious --  
11 to repeat -- obvious indicia of unreliability,  
12 sir, with respect to REDACTED and what he  
13 told you. You had another indicia of  
14 unreliability because what he was telling you was  
15 based on hearsay, a report from REDACTED .  
16 Right?

17 MR. KLEIN: Objection as to form. Calls  
18 for a legal conclusion, but you can answer.

19 THE WITNESS: I didn't have any indicia of  
20 Credibility.

21 BY MR. MACGILL:

22 Q Right. That's right. Because all

1           REDACTED           told you was that he had heard  
2   about the incident from   REDACTED   , the spouse  
3   of the alleged victim of this circumstance.

4           Is that right?

5           A       I don't understand.   You just made a  
6   statement to me.

7           Q       Yes, I did.   And I want to make sure we  
8   know how unreliable this information was.   You  
9   understand that   REDACTED   wanted to remain  
10   anonymous.   Right?

11          A       He requested anonymity.

12          Q       And any reasonable investigator would see  
13   that as some indication of unreliability.   Right?

14          A       No.

15                 MR. KLEIN:   Correct.   I mean not.  
16   Objection as to form.   My apologies.

17   BY MR. MACGILL:

18          Q       Let's talk about the second indicia of  
19   unreliability as far as   REDACTED   is  
20   concerned.

21          A       I didn't agree to the first indicia of  
22   unreliability.   So I don't know why you are moving

1 to an agreed upon second indicia --

2 Q Okay. Let me talk about?

3 A -- of unreliability.

4 Q Let me talk about what's obvious, sir,  
5 in terms of what the jury and the court will hear.  
6 The court will determine whether or not it's an  
7 obvious circumstance of unreliability when you, as  
8 an investigator, relied on a hearsay report given  
9 to REDACTED by REDACTE Would you agree  
10 that any reasonable investigator would understand  
11 that a hearsay report lacks reliability to some  
12 extent?

13 MR. KLEIN: Objection as to form. Calls  
14 for a legal conclusion. You can answer if you can.

15 THE WITNESS: No.

16 BY MR. MACGILL:

17 Q Okay. Let's talk about the next  
18 witness. Dr. -- I'm sorry -- REDACTED .  
19 How did you rely on his word?

20 A I interviewed him.

21 Q And what information did he have?

22 A Again, he corroborated in part the

1 account given by REDACTED .

2 Q How did he corroborate? What  
3 corroboration did he provide?

4 A He was aware of an incident between  
5 Dr. Hunt and REDACTED .

6 Q How did he gain awareness of that  
7 incident?

8 A He had conversation or conversations  
9 with REDACTED .

10 Q Any other basis for his report to you,  
11 sir?

12 A I'm not understanding what that -- what  
13 you mean by that.

14 Q Well, as an investigator don't you need  
15 to understand what the basis is for somebody's  
16 report to you about "facts of a circumstance"?

17 A The basis of his report -- again, I  
18 don't understand what you're asking me.

19 Q You have another -- you have a report by  
20 another witness about what REDACTED said to  
21 him, right?

22 A Correct. What REDACTED said to us

1 was based on his conversation or conversations  
2 with REDACTED .

3 Q And there was no other basis for what he  
4 told you about the incident other than what RED  
ACT  
ED  
said to him.

6 MR. KLEIN: Objection as to form. You can  
7 answer.

8 THE WITNESS: If you are asking me if he's  
9 a firsthand witness as you did with REDACTED ,  
10 likewise he was not a firsthand witness.

11 BY MR. MACGILL:

12 Q I'm asking you something different. I  
13 want you to admit now before we proceed any  
14 further that he had nothing to report to you other  
15 than the hearsay of REDACTED , right?

16 MR. KLEIN: Objection as to form. Calls  
17 for a legal conclusion. You can answer.

18 THE WITNESS: He only reported to us his  
19 conversations with REDACTED , but he also added  
20 his -- his personal relationship with REDACTED  
21 and what his observations were.

22



1 BY MR. MACGILL:

2 Q Okay. So his observations of her in  
3 what sense, sir?

4 A I would have -- again, I would have to  
5 refer to the report. But to the best of my  
6 recollection, the fact that she had trust issues.  
7 That's one thing that stands out.

8 BY MR. MACGILL:

9 Q Let's go to the third witness. This  
10 is -- who is the third witness who wanted to  
11 remain anonymous?

12 A The third witness was REDACTED or  
13 REDACTED I'm not sure.

14 Q And what information did he have that  
15 you relied on?

16 A Likewise, he had conversations with  
17 REDACTED

18 Q Any other -- did he have any other  
19 information with the incident to report to you  
20 other than his conversation with REDACTED ?

21 A I don't believe so.

22 Q So did you understand just as a very

1 fundamental matter that as far as he was concerned  
2 that he was just giving to you a hearsay report?

3 MR. KLEIN: Objection as to form. Calls  
4 for a legal conclusion. You can answer.

5 THE WITNESS: He was providing me with  
6 information based on his conversation or  
7 conversations with REDACTED .

8 BY MR. MACGILL:

9 Q And did you regard that as hearsay?

10 MR. KLEIN: Objection as to form. Asked  
11 and answered. And calls for a legal conclusion.  
12 You can answer one more time.

13 THE WITNESS: It wasn't firsthand  
14 information.

15 BY MR. MACGILL:

16 Q Okay. Now, when I use the term hearsay,  
17 that's a legal and an investigatory term, right?

18 MR. KLEIN: Objection as to form.

19 BY MR. MACGILL:

20 Q As an investigator how do you use the  
21 term hearsay? How do you understand that term.

22 MR. KLEIN: Objection. You can answer.

1 THE WITNESS: As an investigator that is  
2 third-hand informa- -- second-hand information.

3 BY MR. MACGILL:

4 Q Okay. So as an investigator you define  
5 hearsay as second-hand information?

6 MR. KLEIN: Objection. Again, calls for a  
7 legal conclusion, but he can answer.

8 THE WITNESS: It's a legal term that's not  
9 used in the day-to-day activity of an investigator.  
10 It's something we hear as investigators in a  
11 courtroom.

12 BY MR. MACGILL:

13 Q So you had -- with respect to these  
14 three witnesses that you will not disclose to  
15 Pastor Johnny Hunt, you understand that each of  
16 them was giving to you a secondhand account of the  
17 incident; is that right?

18 A That's fair to say.

19 Q Now, with respect to you as an  
20 investigator and your company, Guidepost as an  
21 investigating entity, do you agree, sir, that  
22 second-hand information is less reliable than

1 first-hand observation?

2 MR. KLEIN: Objection. He's not  
3 testifying on behalf of Guidepost. I believe you  
4 asked if Guidepost. He can answer in his individual  
5 capacity and of course then the question is  
6 allowable, but he is not testifying today on behalf  
7 of Guidepost.

8 With that caveat you can answer.

9 BY MR. MACGILL:

10 Q You agree, sir, as lead investigator on  
11 this matter involving Pastor Johnny Hunt that  
12 secondhand information is less reliable -- to  
13 repeat -- less reliable than firsthand  
14 observations?

15 A I don't know that I'm comfortable with  
16 reliable, but I would give more weight to a  
17 firsthand account.

18 Q Now, did you make any notations in what  
19 you included in the report pertaining to Pastor  
20 Johnny Hunt about the fact that you had three --  
21 three of your seven witnesses were providing  
22 secondhand information. Did you say that in any

1 part of your report?

2 A I don't think I used the term  
3 secondhand.

4 Q Did you indicate that this -- did you  
5 indicate -- just so the court here and the jury  
6 can understand what you did or what you failed to  
7 do, sir -- did you indicate anywhere that you had  
8 three of seven witnesses that were providing  
9 accounts that came from -- about the incident --  
10 that came from REDACTED ?

11 MR. KLEIN: Objection as to form and the  
12 use of the word fail, but you can answer.

13 THE WITNESS: I was very clear in my  
14 interview reports that the information that they  
15 provided me during the interview came directly from  
16 REDACTED So I did not fail to provide that.

17 MR. MACGILL: Can we put Pastor Johnny  
18 Hunt back into the Zoom.

19 MS. CALLAS: Pastor Johnny is now in the  
20 room.

21 BY MR. MACGILL:

22 Q Sir, we've covered the details of these

1 three witnesses. You stated that you are  
2 withholding the identity of these three witnesses  
3 from Pastor Johnny Hunt because of their request  
4 to you; is that right?

5 A I don't believe that's what my statement  
6 was.

7 Q But did they request -- did these three  
8 witnesses -- and don't name them in your answer,  
9 please -- did these three witnesses that you  
10 identified in your report that you are refusing to  
11 disclose to Pastor Johnny Hunt, did each one of  
12 them request to be anonymous?

13 A To the best of my recollection, yes.

14 Q And based on that, did you -- did you  
15 undertake to make sure that they were not listed  
16 by name in the report?

17 A Did I ensure that they were not named.

18 Q Take steps. Did you take steps?

19 A In my drafting, I didn't use their name.

20 Q Okay. So -- and again, just so we're  
21 clear, you are refusing even as we sit here today  
22 to disclose their names to Pastor Johnny Hunt,

1 right?

2 MR. KLEIN: Objection. Asked and answered  
3 several times.

4 THE WITNESS: I am not providing the names  
5 today.

6 BY MR. MACGILL:

7 Q Okay. Now, sir, I want to go back to  
8 where we started on some things. We talked about  
9 arm's-length relationships with witnesses?

10 A Yes.

11 Q How many times did you interview the  
12 three witnesses that you referenced in the private  
13 proceedings this morning?

14 A I interviewed --

15 MR. KLEIN: Without revealing their names.

16 BY MR. MACGILL:

17 Q Without out their names.

18 A I interviewed each witness one time.

19 Q One time. I'm going to make a note of  
20 that. Give me a second. One time.

21 How many times did you interview Mr.  
22 Blankenship?

1           A       One time.

2           Q       Tell the court how many times you  
3 interviewed Dr. Hunt?

4           A       Two times.

5           Q       Tell the court, now, sir, and this jury  
6 how many times you interviewed       REDACTED       ?

7           A       Less than -- less than five times. I  
8 don't have an exact number. There were --

9                   MR. KLEIN: You've answered the question.

10          BY MR. MACGILL:

11           Q       Did you answer less than five times?

12           A       That was my answer, yes.

13           Q       How many times did your company  
14 interview       REDACTED       in connection with this  
15 report about Johnny Hunt?

16                   MR. KLEIN: Objection as to form. You can  
17 answer.

18                   THE WITNESS: By my company? What do you  
19 mean?

20          BY MR. MACGILL:

21           Q       Guidepost.

22           A       I was one of the interviewers along with



1 Samantha Kilpatrick. So Samantha and I  
2 interviewed REDACTED . We were the only two  
3 to interview REDACTED .

4 Q How many times did you interview the  
5 REDACTED collectively, REDACTED , in  
6 connection with your investigation.

7 A REDACTED was interviewed one time.

8 Q Did Guidepost conduct at least nine  
9 interviews of the REDACTED before the report was  
10 published?

11 MR. KLEIN: Objection as to form.

12 THE WITNESS: Nine interviews? I don't  
13 know where you are getting that number, but I had a  
14 series of conversations the week of February 10th  
15 with REDACTED , so you could say those were  
16 interviews, approximately three. And then on  
17 March 31st, 2022, Samantha Kilpatrick and I  
18 interviewed REDACTED  
19 present.

20 BY MR. MACGILL:

21 Q And your answer was how many times did  
22 you say? You didn't agree -- I asked if you --

1           A     Nine. I don't know where you get that  
2     number nine.

3           Q     You think that's excessive?

4           MR. KLEIN: Objection as to form. You can  
5     answer.

6           THE WITNESS: I just -- I don't know where  
7     you get that number because I just answered your  
8     question as to when they were interviewed. Now,  
9     were there other conversations, yes, but not  
10    interviews.

11    BY MR. MACGILL:

12           Q     I asked you specifically, and I want to  
13    make sure you are hearing my question and I'm  
14    hearing your answer.

15                   Did Guideposts conduct at least nine  
16    interviews of the REDACTED before the report was  
17    published?

18           MR. KLEIN: Objection as to form. Asked  
19    and answered. You can answer.

20           THE WITNESS: I don't recall the exact  
21    number.

22

1 BY MR. MACGILL:

2 Q All right. I'm going to hand you -- go  
3 back to the interrogatories. Remember we were  
4 referring to the interrogatories, this Exhibit 1.

5 You saw that this was -- these  
6 interrogatories were executed by your chief  
7 operating officer, Mr. Collura.

8 A Yes.

9 Q And you look on page 3 if you would,  
10 sir.

11 A Yes.

12 Q We asked did Guideposts conduct any  
13 interviews of the complainant, Johnny Hunt, or any  
14 other person related to the complainant's  
15 allegations against Johnny Hunt.

16 Do you see that?

17 A Do I see --

18 Q That question.

19 A Okay.

20 Q Do you see that, sir?

21 A Yes.

22 Q And then your company responded saying

1     yes.   Do you see that?

2           A     Yes.

3           Q     And you see the listing then that your  
4     company made through its chief operating officer  
5     on his oath?

6           A     I'm comfortable with the dates that are  
7     provided here.

8           Q     And what he showed -- you can count  
9     them -- but there are at least nine interviews  
10    that your company identified under penalties of  
11    perjury of the REDACTED prior to the time the  
12    report was given.   Right?

13          A     Okay.

14          Q     Right?

15          A     Okay.

16          Q     Yeah.   Now, back to arm's length, sir.  
17    Do you think it's an arm's-length relationship  
18    with a witness or witnesses like the REDACTED to  
19    have nine interviews before your report?

20          A     I don't think a number determines  
21    appropriateness of witness interaction.

22          Q     Now, let's talk about boundaries in an

1 arm's length relationship. Is it ordinarily the  
2 case that you would be doing text messaging over a  
3 period of months with a witness that is used in  
4 your report?

5 A Is it what now?

6 Q Is that customary to have a text  
7 relationship -- a texting relationship with a  
8 witness that has extensive text messages sent  
9 between you and REDACTED for months?

10 MR. KLEIN: Objection as to form.

11 THE WITNESS: That's consistent with my  
12 experience.

13 BY MR. MACGILL:

14 Q And did you have text messages with the  
15 three witnesses that you won't identify for Pastor  
16 Johnny Hunt?

17 A I did not.

18 Q But you did have many text messages with  
19 REDACTED did you not?

20 A Yes.

21 Q Did you talk to REDACTED, one of  
22 the witnesses in your report, about a job at some

1 point?

2 A He sent me a message.

3 Q About a job, didn't he?

4 A Yes.

5 Q Now, let's just look at you for just a  
6 minute about you being a lead investigator. Is  
7 that out of bounds in terms for you in terms of  
8 the type of work you do, as lead investigator on  
9 this matter, to be speaking with a witness about a  
10 job?

11 A I received a message. I did not  
12 initiate that discussion, and I believe my  
13 response to that was minimal and did not encourage  
14 the witness in any way. It was responsive.

15 Q Do you remember getting a text message  
16 from him on February 1st saying I'm going to apply  
17 for job with GPS. Does that refer to the  
18 Guidepost?

19 A It does.

20 Q Is that your company?

21 A Yes. It's a commonly used acronym.

22 Q Great. Thank you. Do you remember

1 getting a text from him on February 1st on that  
2 topic?

3 MR. KLEIN: What year are we talking  
4 about? I'm sorry.

5 BY MR. MACGILL:

6 Q February 1st of any year. Do you  
7 remember getting a text from him February 1st of  
8 any year.

9 THE WITNESS: Could I see want document.

10 BY MR. MACGILL:

11 Q I'm just asking if you remember first.

12 A Generally, yes.

13 Q And do you remember being asked by text  
14 by REDACTED , would you mind if I used you as  
15 a reference.

16 Do you remember that?

17 A That sounds familiar.

18 Q And do you remember responding to him?

19 A I'm sure I responded to him.

20 Q How did you respond to this witnesses in  
21 the report, sir?

22 A I don't remember my exact response.

1           Q     Generally, do you have any recollection  
2 of what you said?

3           A     I did not respond in a negative fashion.

4           Q     Did you say, sure, you'd do that?

5           A     I may have.

6           Q     Did he thank you for that?

7           A     I don't remember.

8           Q     Did you ask him job what job he was  
9 applying for at Guidepost?

10          A     I don't remember.

11          Q     Do you remember him telling you he  
12 wanted to be considered as a senior consultant  
13 physical security?

14          A     I don't remember that.

15          Q     Now, let's talk about you for a few  
16 minutes. And you as an investigator, whether you  
17 have a arm's-length with a witness.

18                 Does this type of communication to you put  
19 up any "red flags" so to speak?

20                 MR. KLEIN: Objection as to form. You can  
21 answer.

22                 THE WITNESS: No.



1 BY MR. MACGILL:

2 Q Let me ask you about other relationships  
3 that you had with REDACTED , you as lead  
4 investigator for Guidepost, do you remember before  
5 the publication itself sending text messages to --  
6 exchanging text messages with REDACTED about  
7 interceding on his behalf in any way?

8 MR. KLEIN: Objection as to form. You can  
9 answer.

10 THE WITNESS: I don't remember. And I'm  
11 not sure what you are talking about.

12 BY MR. MACGILL:

13 Q Do you remember reading text messages  
14 yesterday that you got from REDACTED prior to  
15 the time of the publication of the report?

16 A In general, yes.

17 Q Okay. What in general were you texting  
18 with him about prior to the publication of the  
19 Guidepost report?

20 A His availability to get on a call  
21 perhaps? I -- I don't know. It's a very general  
22 question. I don't know.

4

1 with REDACTED before February 10th of 2022.  
2 So it couldn't have been in 2022 because I didn't  
3 know who REDACTED was on February 1st, 2022.  
4 So it had to have been February 1st, 2023.

5 BY MR. MACGILL:

6 Q When did you first get a relationship  
7 with -- when did you first start your texting  
8 relationship with REDACTED ?

9 MR. KLEIN: Objection as to form. You can  
10 answer.

11 THE WITNESS: After February 10th, 2022.

12 BY MR. MACGILL:

13 Q And at that point you began texting him  
14 on various matters?

15 A Him texting me mostly, but yes. I  
16 texted him after February 10th, 2022.

17 (HOLSKE Exhibit Number 4 was marked for  
18 identification.)

19 BY MR. MACGILL:

20 Q Let me hand you the next exhibit, sir.  
21 Exhibit 4.

22 A Can I have a minute to review this

1 please.

2 Q Of course.

3 A Okay.

4 Q And do you recognize this as a text  
5 between you and REDACTED ?

6 A Yes.

7 Q What was the topic that you were  
8 speaking with him about?

9 A I don't have context here because it  
10 doesn't seem that the whole message string is  
11 included. So I'm not sure.

12 Q So there were some -- have you seen this  
13 document in recent months?

14 A I don't know that I've seen this  
15 particular screen shot.

16 Q Now, what's the date of this text  
17 exchange, which is Exhibit 4?

18 A REDACTED

21 Q Now, sir, I'm going to talk about your  
22 conduct during this period of time, April of 2022.

1 By this time were you writing internal memorandas  
2 or emails saying that you would not, in connection  
3 with your work on this case, be creating a "paper  
4 trail"?

5 A I don't recall.

6 Q You don't recall in April of 2022 having  
7 internal communications at Guidepost that  
8 indicated very specifically that you would not be  
9 creating a "paper trail" in connection with your  
10 work and certain features of it?

11 MR. KLEIN: Objection. Asked and  
12 answered.

13 THE WITNESS: I don't recall.

14 BY MR. MACGILL:

15 Q Don't recall anything like that, sir?

16 MR. KLEIN: Objection. Asked and  
17 answered.

18 THE WITNESS: Again, I don't remember.

19 BY MR. MACGILL:

20 Q So by this time, whether you recall any  
21 internal communications or not, by April of 2022,  
22 were you being secretive in terms of

1       communications in that you were being cautious  
2       about not creating a "paper trail" on certain  
3       topics.

4             A       I don't agree with the term secretive.

5             Q       But you do agree that you took steps to  
6       avoid creating a "paper trail" as of the April  
7       period of time?

8             MR. KLEIN:   Objection.   Asked and  
9       answered.

10            THE WITNESS:   I don't recall the term that  
11       you used, paper trail.

12       BY MR. MACGILL:

13            Q       Now,    REDACTED   -- let me ask you this:  
14       In terms of having an arm's length witness for the  
15       -- strike that.

16            In terms of having a arm's length  
17       relationship with a witness, would it be appropriate  
18       for a witness to be asking you to destroy records of  
19       an investigation?

20            A       I'm sorry.   Could you ask that one more  
21       time?

22            Q       Would it be appropriate in a

1 relationship with a witness that you had in an  
2 investigation for you to have a witness who made a  
3 specific request to destroy documents?

4 A That's the decision of the witness to  
5 ask that question. Whether it's appropriate or  
6 not is really not for me to determine that he asks  
7 that.

8 Q So you would -- it wouldn't raise any  
9 concerns on your mind if a witness, after an  
10 investigation was published, asked whether you had  
11 destroyed documents as requested?

12 A I would only be concerned with my  
13 particular reaction to that.

14 Q Do you recall REDACTED requesting you  
15 specifically to destroy documents in connection  
16 with this investigation?

17 A I don't.

18 Q You don't recall anything about RED  
19 REDACTE at any time asking you to destroy  
20 documents?

21 A No, I do not.

22 Q Sir, I want you to look back at the

1 engagement letter if you would, Exhibit 2. And  
2 I'd like you to refer to the scope of the  
3 engagement. Tell me when you are there, please.

4 A Page 5, I assume?

5 Q Yes, sir.

6 A Okay.

7 Q It's Bates number EC00013. Do you have  
8 that in front of you?

9 A Yes, sir.

10 Q And it says -- bullet point two, which  
11 is what -- these are the bullet points that you  
12 operated under; is that right?

13 A Correct.

14 Q This was part of your interview  
15 template, correct?

16 A Correct.

17 Q And you were -- you were -- you were  
18 going to investigate mishandling of abuse  
19 allegations by executive committee members between  
20 January 1, 2000, and June 14, 2021.

21 Do you see that?

22 A I see that.



1           Q     So Pastor Johnny Hunt was not an  
2 executive committee member between January 1, 2000  
3 and June 1, 2021, was he?

4           A     He was.

5           Q     He was? What membership did he have  
6 between January 1st, 2000, and January 14, 2021?

7           A     As president of the SBC from 2008 until  
8 2010 he was -- I think the term is ex officio  
9 member of the executive committee.

10               MR. MACGILL: May I hear that answer back,  
11 please?

12               (Whereupon, the Reporter read the record  
13 as requested.)

14 BY MR. MACGILL:

15           Q     And when was he an ex officio member of  
16 the executive committee?

17           A     Do you want me to repeat what I just  
18 said.

19           Q     Yeah. When? You said 2008 to 2000 --

20           A     10.

21           Q     And what did you base that on?

22           A     Records provided by the Southern Baptist

1 Convention of who the presidents were from  
2 January 1, 2000 to June 14th, 2021.

3 Q Bullet point one references allegations  
4 of abuse by executive committee members.

5 A Correct.

6 Q All right. Now, you were engaged --  
7 just so we know, and keep in mind the date of this  
8 letter, you were engaged on October 5, 2021,  
9 right?

10 MR. KLEIN: Objection. The letter speaks  
11 for itself, but you can answer.

12 THE WITNESS: One moment please.  
13 Actually, the engagement signatures are -- by my  
14 company was on October 6, 2021.

15 BY MR. MACGILL:

16 Q Okay. So you would say that the  
17 engagement began October 6th, 2021?

18 A Yes.

19 Q Okay. And looking at the first bullet  
20 point it says that your investigation was to  
21 include allegations of abuse by executive  
22 committee members.

1 Do you see that?

2 A I do.

3 Q All right. Now, for what period of  
4 time? You were engaged in 2021, allegations of  
5 abuse -- you were to look at allegations of abuse  
6 by executive committee members for what period of  
7 time, sir?

8 A No date is provided here.

9 Q So what did you do. There was no date  
10 provided so what did you look -- what was your  
11 look-back period?

12 A We would have taken any allegation of  
13 sexual abuse by anybody over any period of time.  
14 What would have ended up in the report would have  
15 been the decision of the engagement project  
16 manager and leadership from Guidepost Solutions.

17 Q So your footprint was any allegation of  
18 abuse by executive committee member, right?

19 A Correct.

20 Q Didn't matter what time?

21 A We would have heard anybody that would  
22 have called forward to make a report. What ended

1 up being in the report, the general parameters  
2 were January 1, 2000 to June 14, 2021. But as you  
3 and I both see here on this engagement letter,  
4 there's no date under the first bullet, so I can't  
5 answer more specific than that.

6 Q So the incident involving Pastor Johnny  
7 Hunt was when?

8 A I'm sorry?

9 Q The incident involving Pastor Johnny  
10 Hunt was when?

11 A July 25, 2010.

12 Q So when did you first become aware of  
13 this incident?

14 A During the week of February 10th, 2022.

15 Q Okay how did you become aware of it?

16 A In conversations with REDACTED .

17 Q How were you referred to REDACTED ?

18 A REDACTED -- so we had at -- at  
19 Guidepost Solutions we had a hotline set up where  
20 witnesses could email or call to report matters  
21 involving sexual abuse and the Southern Baptist  
22 Convention. And REDACTED wrote into that

1 hotline an email.

2 Again, I use the term project manager but  
3 the one leading the engagement, Krista Tongring  
4 forwarded me that email, I believe, and asked me to  
5 follow up with REDACTED . And so that's what I  
6 did. I think by email I reached out to him and  
7 asked him about his availability or if he wished to  
8 talk to Guidepost Solutions.

9 Q Now, when you had your initial contact  
10 with REDACTED did he ask you about what your  
11 company would do to validate that the authenticity  
12 of stories given to them before going public?

13 A That sounds familiar.

14 Q And do you remember that specifically  
15 that he wanted to know how Guidepost will validate  
16 the authenticity of stories provided?

17 A I recall that I told him that we would  
18 corroborate or validate information received in a  
19 general sense. This is before I knew anything  
20 about what he was going to tell me. By reviewing  
21 documents, emails, talking to other witnesses,  
22 something like that.

1           Q     From the outset,     REDACTED     was  
2     concerned in terms of what he expressed to you  
3     about slander or liability issues, right?

4           A     I remember him being concerned about  
5     retaliation against him as a witness specifically.  
6     I don't recall specifically his concerns about --  
7     what is it you said? Slander or --

8           Q     Right. Did he wonder to you how  
9     Guidepost ensures that slander and/or liability  
10    issues are not breached?

11          A     I don't recall.

12                (HOLSKE Exhibit Number 5 was marked for  
13                identification.)

14               MR. SANDERS: So we're going to mark this  
15    as Exhibit 5 -- we only have electronic copies.  
16    Bates number from the first page is Guidepost  
17    013946. It's a three-page document. Final Bates  
18    number is Guidepost 013948.

19    BY MR. MACGILL:

20          Q     So we're going to give you an iPad that  
21    has this document electronically on it. I ask  
22    that you read it first and I have one question for

1     you.

2                   MR. KLEIN:   Give us one second and I can  
3     pull it up or you have one.

4                   MR. SANDERS:   I have one for you.

5     BY MR. MACGILL:

6           Q     Tell us when you've read it, sir.

7           A     Okay.   I will.

8                   MR. KLEIN:   Thank you.   I'm going to read  
9     it, too.

10    BY MR. MACGILL:

11          Q     All right, sir.   Just so we're  
12    oriented --

13          A     I haven't finished yet.

14          Q     I'm just going to ask you about one  
15    email, just so we're clear.   I'm going to ask you  
16    only about the email of February -- Friday,  
17    February 11 at 2:43.   I'm not going to ask you  
18    about anything else.   And I'm not going to recite  
19    the document.   So a question about this email.

20                 MR. KLEIN:   No problem.   And I appreciate  
21    that.   You still -- if you need to understand that  
22    in context, you can read the entirety of the email

1 thread.

2 THE WITNESS: I would like to read it.

3 BY MR. MACGILL:

4 Q Go ahead.

5 A Review the chain of the email. It won't  
6 take me on.

7 Q Don't worry. I'll ask you about all of  
8 it then, okay, just so we're clear.

9 Have you read Exhibit 5 in its entirety?

10 A I have.

11 Q You testified earlier to this court that  
12 February 10th was the first day that you reached  
13 out to REDACTED ; is that right?

14 A On or about that date, yes.

15 Q And is it fair to say one of the things  
16 that you asked him is you wanted corroborating  
17 information pertaining to his hotline inquiry; is  
18 that right?

19 MR. KLEIN: Objection as to form. You can  
20 answer.

21 THE WITNESS: In this email string?  
22



1 BY MR. MACGILL:

2 R  
E  
D  
A  
C  
T  
E  
D

17 A Yes.

18 Q Okay.

19 A That's not a question, though.

20 Q I'm sorry?

21 A That's not a question.

22 Q We'll just keep moving on. All right.

1 So no question that's what you wrote, right?

2 A What you just recited, that's what I  
3 wrote.

4 R  
E  
D  
A  
C  
T  
E  
D

1 THE WITNESS: Yes. I think I testified  
2 earlier that I sent him an email in response to  
3 Krista Tongring's request for me to reach out to RED  
4 REDACTE So that would have been before this email.

5 BY MR. MACGILL:

6 Q Yes, you did. I think you testified to  
7 that. I'm asking you something different that you  
8 may not have understood.

9 I asked you is this the first email that  
10 he sent to you?

11 A I don't know.

12 Q REDACTED

17 MR. KLEIN: Objection as to form. Asked  
18 and answered. You can answer.

19 THE WITNESS: I don't know.

20 BY MR. MACGILL:

21 Q Don't recall as you sit here today?

22 A I don't.

1

Q

REDACT  
ED

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A

REDACTED

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REDACTED

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Q Okay. But for your part, you never, at  
Guidepost -- you, for your part or Guidepost,  
never at any time validated the authenticity of  
REDACTED allegations separately, did you?

MR. KLEIN: Objection as to form. He's  
testifying in his individual behalf, not on behalf  
of Guidepost. With that caveat you can answer if  
you can.

THE WITNESS: Yes. We validated the  
authenticity of REDACTED statement about what  
happened between her and Dr. Hunt on July 25th,  
2010.

1 BY MR. MACGILL:

2 Q What validation did you have, sir?

3 Strike that.

4 I would like you to explain to the jury,  
5 specifically now, under oath what validation did you  
6 have of the account of the encounter between Pastor  
7 Johnny Hunt and REDACTED ?

8 Specifically, what did you have?

9 A We had a statement of three witnesses.

10 Q Please name the three -- are these the  
11 three witnesses that you named previously?

12 A I did not name the witnesses previously.

13 MR. KLEIN: I think he meant in the  
14 private section. Are those the three?

15 THE WITNESS: Yes.

16 MR. KLEIN: I didn't mean to speak over  
17 you, Rob.

18 BY MR. MACGILL:

19 Q We are not going to name the names, but  
20 with respect to those three witnesses, each of  
21 them was relying on REDACTED information  
22 about the incident, right?

1           A     Yes.   The first witness provided his  
2   recollection of conversations that happened  
3   contemporaneous to the event in 2010.   The second  
4   witness provide the information about his  
5   conversation or conversations with       REDACTED  
6   from the year 2012.   And then the third witness  
7   provided information regarding his conversations  
8   that happened in approximately 2018.   And then Roy  
9   Blankenship's statements to us were another form  
10   of corroboration as to the statement by the REDACTED  
11   REDACTED

12           Q     Any other validation other than these  
13   three witnesses that you have named on the record  
14   and the Mr. Blankenship?

15           A     Yes.

16           Q     What other validation, sir?

17           A     We obtained a hard drive from       REDACTED  
18   that contained writings and audio recordings  
19   contemporaneous to the event that speak to the  
20   trauma of both               REDACTED               regarding  
21   the sexual assault by Dr. Hunt in 2010.   And then  
22   lastly, we have the false statement of Dr. Hunt on



1 May 12, 2022.

2 Q Any other validation in your mind, sir?

3 A I believe there's a document, perhaps  
4 the rental agreement of the condominium where the  
5 incident -- where the assault took place. That  
6 may be all of the information, but I don't recall  
7 if that's exactly everything.

8 Q To the best of your recollection, having  
9 met with lawyers on two days, having looked for  
10 documents for hours, and otherwise prepared for  
11 this testimony, those are each of the validations,  
12 according to you, for the report that you  
13 issued -- that Guidepost issued?

14 A Those are validation.

15 Q Now, just to -- with respect to each of  
16 those, let's just cover witness one, two, and  
17 three that you -- you know, were going to honor  
18 the requests at this point, we have no choice but  
19 to honor your demand that Pastor Johnny Hunt not  
20 be told of witness one, two, and three. Okay? I  
21 want you to understand this. I'm going to use  
22 witness one, two, or three. Not names.

1 Fair enough?

2 A Okay.

3 Q Now, witness one, that report was based  
4 on what REDACTED said to witness one.

5 MR. KLEIN: Objection. Asked and  
6 answered. You can answer again.

7 THE WITNESS: What witness one told us was  
8 based on his conversation or conversations with

9 REDACTED

10 BY MR. MACGILL:

11 Q And witness two, the same is true. It's  
12 based on his conversations with REDACTED ,  
13 right?

14 MR. KLEIN: Objection. Asked and  
15 answered.

16 THE WITNESS: Yes.

17 BY MR. MACGILL:

18 Q Witness three, again based on the  
19 conversations witness three had with REDACTED ;  
20 is that right?

21 MR. KLEIN: Objection. You can answer.

22 THE WITNESS: Yes.

1 BY MR. MACGILL:

2 Q And you knew and you saw with your own  
3 eyes documentation that REDACTED wrote in  
4 written materials that he believed specifically in  
5 the encounter between REDACTED and Johnny Hunt  
6 was consensual until only recent years, right?

7 A I'd have to look at the exact document  
8 you are referring to.

9 Q Well, sir, you published -- you went  
10 back 12 years to put -- to put a claim about an  
11 incident 12 years prior in your report, right?  
12 Right?

13 A The incident took place in 2010.

14 Q And that you wrote a report dated May  
15 2022, right?

16 A Correct. The report was issues in May  
17 of 2022.

18 Q So someone like you, doing investigatory  
19 work in the way that you do it, you understood,  
20 even for your part that you were going 12 years  
21 back in time, right?

22 A That's 12 years between 2010 and 2022.

1           Q     And you knew without any doubt that RED  
2     REDACTE himself, at or near the time of this  
3     incident, described the incident as consensual,  
4     didn't you, sir?

5           MR. KLEIN:   Objection as to form.

6           THE WITNESS:   I don't know when REDACTED  
7     REDACTED               discussed the consensual  
8     nature or nonconsensual nature of the incident.

9     BY MR. MACGILL:

10          Q     This is important for the jury to hear,  
11     sir, and for the court to hear directly from you.  
12     You knew, sir, that REDACTED , near the time of  
13     the 2010 incident, described this incident as  
14     between his wife and Pastor Johnny Hunt as  
15     consensual, right?

16          MR. KLEIN:   Objection as to form.   The  
17     jury and the court need to hear that you asked the  
18     same question over and over again.   And so I'm going  
19     to object and, of course, allow him to answer unless  
20     it becomes harassing.   We're not there yet.   You can  
21     answer now again.

22          MR. MACGILL:   Can I have the question read

1 back, sir.

2 THE WITNESS: That would be great.

3 (Whereupon, the Reporter read the record  
4 as requested.)

5 BY MR. MACGILL:

6 Q Let me start with a new question. You  
7 understood, did you not, that at or near the time  
8 of the 2010 incident that REDACTED described  
9 this incident as consensual between his REDA and  
10 Pastor Johnny Hunt?

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: I recall that REDACTED  
14 told us that Roy Blankenship termed the incident  
15 between REDACT and Dr. Hunt as inappropriate but  
16 Consensual, and that that is the narrative, false  
17 narrative according to REDACTED , that he received  
18 and accepted at the time.

19 BY MR. MACGILL:

20 Q So REDACTED did admit to you when you  
21 interviewed him that he understood after 2010 for  
22 some period of time that the encounter between

1 pastor Johnny Hunt and his REDACT was consensual?

2 MR. KLEIN: Objection. Mischaracterizes  
3 his testimony. And it's been asked and answered.  
4 You can answer.

5 THE WITNESS: I understood that he  
6 accepted the narrative defined by Roy Blankenship in  
7 the presence of Dr. Hunt and REDACTED as  
8 inappropriate but consensual and that he accepted  
9 that narrative at that time.

10 BY MR. MACGILL:

11 Q And you understood that prior to this  
12 report being published?

13 A I understood that he accepted that  
14 narrative at that time.

15 Q And he changed that narrative with  
16 information that was provided eight or nine years  
17 later to you, right?

18 MR. KLEIN: Objection as to form?

19 THE WITNESS: Who changed the narrative.

20 BY MR. MACGILL:

21 Q REDACTED changed his views on  
22 whether it was consensual or not eight or nine

1 years after the event, didn't he?

2 MR. KLEIN: Objection as to form.

3 THE WITNESS: I don't know when that  
4 happened.

5 BY MR. MACGILL:

6 Q Well, sir, you knew based on your  
7 work -- we've got all the documents right here  
8 that we're going to show you today. But you knew  
9 by 2018 or 2019 REDACT had a different opinion as  
10 to whether the encounter was consensual or not,  
11 right?

12 A It changed from August 2, 2010, until  
13 when I spoke to him in February of 2022, but I do  
14 not know when that changed.

15 Q Because there was a change in his view  
16 from consensual to not consensual, did that raise  
17 any red flags with you as an investigator with  
18 some 30 years experience?

19 A It did not because I took into  
20 consideration that Roy Blankenship manipulated the  
21 narrative for a period of several months and that  
22 that impacted how he viewed the encounter between

1 Dr. Hunt and his wife, REDACTED .

2 Q Are you saying to this court that  
3 Mr. Blankenship is a liar?

4 A No, I'm not.

5 Q Are you saying anything that -- are you  
6 saying he spoke something that was untruthful in  
7 any way at any time, sir?

8 A That's not what I said.

9 Q All right. So he's -- he's an honest  
10 person as far as you know?

11 MR. KLEIN: Objection as to form.

12 BY MR. MACGILL:

13 Q Right?

14 A He was honest. I believe he was being  
15 honest with us when he interviewed him on May 9,  
16 2022, if that's what you're asking.

17 Q Did you -- sir, did you listen to the --  
18 did you -- strike that.

19 You came to learn that REDACTED  
20 had tape recorded the counseling session with his  
21 wife and Pastor Johnny Hunt, right?

22 A No.



1 Q You didn't know that?

2 A Tape recorded the conversation  
3 between -- with Pastor Johnny Hunt?

4 Q Between Blankenship, Hunt, and his REDACT  
5 Did you understand there had been a tape recording  
6 of that?

7 A I listened to tape recordings, audio  
8 recordings, between Roy Blankenship and the  
9 REDACTED .

10 Q All right. And you did that prior to  
11 the publication of the report?

12 A Correct.

13 Q Now, sir, we're going to review later in  
14 your testimony a request of REDACTED about  
15 document destruction. Did you yourself destroy  
16 any documents in this case?

17 A No.

18 Q Now, we have the record evidence. By  
19 the time you testify, sir, will be before this  
20 court and jury pertaining to the documents  
21 produced by REDACTED and the documents that  
22 were produced by your company. And there are

1 documents missing from your company's production.  
2 And that's been documented and will be proven to  
3 this court and to this jury.

4 Did you have anything to do with the  
5 missing documents, sir?

6 MR. KLEIN: Objection as to form.

7 THE WITNESS: I don't know what you're  
8 referring to.

9 BY MR. MACGILL:

10 Q You don't have any knowledge about  
11 issues pertaining to the production of your  
12 company of the failure to produce documents that  
13 were produced by the REDACTED ?

14 MR. KLEIN: Objection as to form.

15 THE WITNESS: I don't know what you're  
16 referring to.

17 BY MR. MACGILL:

18 Q But for your part, what you are  
19 confirming is you did not take any steps yourself  
20 to destroy documents?

21 A Destroy documents?

22 Q Yes.

1           A       No.

2           Q       Pertaining to this investigation, you  
3 did not destroy documents?

4           A       I am aware that there are some text  
5 messages perhaps between me and other parties that  
6 were provided by other parties that I did not  
7 retain.

8           Q       Why not?

9           A       I, as a practice, do not retain every  
10 text message that I receive. I frequently clean  
11 out my emails and my texts. That's how I operate.  
12 If you were to look at my email inbox right now,  
13 you'd probably see a half dozen emails. Some  
14 people, if you looked at their email, they'd have  
15 a thousand, 800 not read. In general on a  
16 periodic basis, I swipe my text messages and I do  
17 so to maintain organization and to keep myself  
18 focused, and that's how I organize myself. And  
19 perhaps I deleted a text at some point in time  
20 between me and another party to this  
21 investigation.

22          Q       But, you know, I think you understand

1     what I'm asking.     REDACTED     wrote you and asked  
2     whether you had destroyed documents as requested.  
3     Do you recall that?

4                 MR. KLEIN:   Objection.   I believe asked  
5     and answered earlier, but you can answer.

6                 THE WITNESS:   I don't recall specifically.

7     BY MR. MACGILL:

8                 Q                 REDACTED

11                A     I don't know the exact date, but I  
12     recall an email or something of that sort.  
13     Perhaps a text message.

14                Q     Did you respond to him?

15                A     I did.

16                Q     How did you respond to him.

17                A     I think I referred him to the firm Mintz  
18     and Gold.

19                Q     To the law firm?

20                A     Correct.

21                Q     Now, sir, you talk about how you  
22     maintain organization, but you'll admit right now

1 without any equivocation on your part that you  
2 took steps in connection with this investigation  
3 involving Pastor Johnny Hunt to make sure there  
4 was "paper trail" as to portions of your work.

5 MR. KLEIN: Objection as to form. Asked  
6 and answered.

7 THE WITNESS: I disagreed with you before,  
8 and I disagree with you now.

9 BY MR. MACGILL:

10 Q REDACTED

14 MR. KLEIN: Objection as to form. Asked  
15 and answered.

16 THE WITNESS: I don't remember that.

17 BY MR. MACGILL:

18 Q You don't recall that?

19 A I don't recall that.

20 Q As a part of your work on this matter,  
21 sir, did you or did you not take steps to make  
22 sure there was REDACTED on certain

1 matters?

2 MR. KLEIN: Objection as to form. This is  
3 the seventh time. You can answer one more time.

4 THE WITNESS: No.

5 BY MR. MACGILL:

6 Q You don't recall such an email, and to  
7 your knowledge, you never sent such an email?

8 MR. KLEIN: Objection. Do not answer that  
9 question. It's been asked eight times. Please  
10 don't ask for a different answer.

11 MR. MACGILL: Why don't we take about a  
12 ten-minute break. Then maybe a short -- then we'll  
13 come back for a little session before lunch.

14 VIDEOGRAPHER: Off the record at 11:31.

15 (Whereupon, a brief recess was taken.)

16 VIDEOGRAPHER: We're now back on the  
17 records at 11:50.

18 BY MR. MACGILL:

19 Q Sir, welcome back. I want to -- you  
20 testified before the break that you've used the  
21 phrase sexual assault. Do you remember that  
22 phrase?

1           A       I don't remember exactly using that  
2 phrase, but I won't disagree.

3           Q       You used it at least twice in your  
4 testimony. What did you mean when you said sexual  
5 assault. How do you define sexual assault for  
6 purposes of the answers that you have given?

7           A       Unwanted sexual contact between two  
8 individuals.

9           Q       And where do you get that definition?

10          A       By common understanding.

11          Q       Did you define terms in your report?

12          A       I don't recall if it was defined in the  
13 report.

14          Q       Did you describe this incident between  
15 Pastor Johnny Hunt and REDACTED as a sexual  
16 assault?

17          A       I believe that was how it was referred  
18 to in the document. I don't have it in front of  
19 me, but that's how it was referred to.

20          Q       That was how it was referred to? Is  
21 that what you're testifying to?

22               MR. KLEIN: Objection. Mischaracterizes

1 his testimony.

2 THE WITNESS: I would need to see it.

3 BY MR. MACGILL:

4 Q All right. But if you did use the term  
5 sexual assault in the report, what you mean is  
6 unwanted sexual contact.

7 A Between two individuals.

8 Q Okay. Fair enough. Now, sir, we  
9 covered this in part before, but would you take a  
10 look at the engagement letter, the third page of  
11 it, which is EC0014. This is Exhibit 2.

12 A Where on this page would you like me to  
13 look?

14 Q Top of page 6. It says: As to  
15 transparency, the \*\* report would be a "public  
16 report." Is that right?

17 A That's what it says here.

18 Q And that was always your understanding  
19 from the beginning of your work that you did.  
20 Until the report was published by Guidepost,  
21 right?

22 MR. KLEIN: Objection as to form.



1 THE WITNESS: Yes.

2 BY MR. MACGILL:

3 Q Now, sir, I want to ask if you turn to  
4 the page number 6, which is EC00016, do you see a  
5 section on indemnification?

6 A I do see that section.

7 Q There's a -- it says here that the SBC  
8 agrees to indemnify Guidepost for any actions,  
9 judgments or claims against Guidepost arising out  
10 of the engagement.

11 Do you know why your company asked for SBC  
12 to indemnify your company for any actions, judgments  
13 or claims arising out of the engagement?

14 MR. KLEIN: Objection. Calls for a legal  
15 conclusion. You can answer.

16 THE WITNESS: I don't.

17 BY MR. MACGILL:

18 Q And then it continues: Unless and until  
19 it were to be finally adjudicated that Guidepost  
20 actions were negligent, tortious, or beyond the  
21 scope of the engagement.

22 Do you see that?

1           A       I see it.

2           Q       So as you sit here as a lead  
3 investigator, do you understand that if your  
4 judgment -- if your actions are deemed negligent,  
5 that there is no indemnity obligation.

6                   MR. KLEIN:  Objection.  Calls for a legal  
7 conclusion.  You can answer.

8                   THE WITNESS:  I understand.

9 BY MR. MACGILL:

10          Q       You understand that to be the case?

11          A       What you just said, I understand.

12          Q       Yeah.  And I want to ask you, as a lead  
13 investigator, so you knew that if you or those  
14 working with you at Guidepost were negligent,  
15 tortious, for example, that you would not have  
16 indemnity from SBC.  Right?

17                   MR. KLEIN:  Objection.  At what point are  
18 we talking about?

19                   THE WITNESS:  This is the first time I've  
20 read this today.

21 BY MR. MACGILL:

22          Q       Not seen this before?

1           A     No.

2           Q     Now that you've read it -- well, let me  
3 just ask you this. Did you -- as you did your  
4 work, did you understand that if you were  
5 negligent in your work that you would not have the  
6 right to be indemnified by Guidepost?

7           A     That was never discussed.

8           Q     Okay. So it never came up on your radar  
9 screen?

10          A     Not with me directly, no.

11          Q     Sir, if you look at section 3.6, in  
12 terms of your understanding, the last sentence of  
13 3.6 of this engagement letter, which is Exhibit 2,  
14 says: A written report will be made public in its  
15 entirety prior to 2022 SBC annual meeting.

16                Did you understand that to be the case at  
17 the time you were doing your work?

18          A     I wasn't aware of these terms here  
19 outlined in 3.6.

20          Q     Okay. But you understood your work  
21 needed to be finished prior to that SBC meeting,  
22 annual meeting, in 2022?

1           A       I just knew that the report would be  
2 published at the end of our investigation. I  
3 didn't have it related to any certain event or  
4 date.

5           Q       At the beginning of your work did you  
6 work on making a request for documents to the  
7 executive committee? Was that part of your  
8 personal work?

9           A       Me personally, I did not make any  
10 requests for documents to the executive committee.

11          Q       Who did that?

12          A       I don't know.

13          Q       Did Guidepost receive documents in  
14 response to requests of information from the SBC?

15          A       Yes.

16          Q       Now, sir, you testified earlier that in  
17 preparation for the deposition you reviewed four  
18 different text messages involving four different  
19 parties. Do you remember that?

20          A       Number four doesn't -- I don't remember  
21 that, but I did review text messages from  
22 different parties.

1           Q     And one was from the -- you reviewed  
2     text messages from your CEO?

3           A     Yes.

4           Q     And from Krista Tongring?

5           A     Correct.

6           Q     From Ms. Kilpatrick?

7           A     Yes.

8           Q     And who was the fourth person?

9                     MR. KLEIN:  Objection as to form.  You can  
10    answer.

11                    THE WITNESS:        REDACTED        was one -- an  
12    additional person.

13    BY MR. MACGILL:

14           Q     And how did you gain access to these  
15    text messages from these four parties?

16           A     Some were text messages that I had that  
17    I -- that I provided upon request.

18           Q     Provided to whom?

19           A     We were directed to utilize some type of  
20    software to upload text messages.

21           Q     Who directed you to do that?

22           A     Someone in our organization.  Brian Kim.

1           Q       Brian Kim. You said that your custom  
2       and practice is to simply delete text messages,  
3       keep your phone clean, so to speak, right?

4           A       That's fair to say.

5           Q       And so you didn't look at any text  
6       messages on your phone?

7           A       I'm sorry?

8           Q       You did not look at any text messages on  
9       your phone in preparation for your testimony?

10          A       I didn't directly look back at my phone  
11       because everything I had on my phone I uploaded as  
12       directed.

13          Q       By whom?

14          A       So the directive to upload text messages  
15       came from someone on our technical staff named  
16       Brian Kim. He handles eDiscovery I believe.

17          Q       All right. And what's his job in your  
18       firm?

19          A       As I said, eDiscovery facilitation I  
20       guess.

21          Q       Is he a lawyer?

22          A       He might have a law degree.

1           Q     All right.  So did you -- did you go --  
2     did you seek him out when you said you wanted to  
3     review the text messages from these, involving  
4     these four people?

5           A     Seek him out, no.

6                     MR. KLEIN:  You mean to prep for the --  
7     deposition prep.

8     BY MR. MACGILL:

9           Q     Why did -- what did you -- so why in the  
10    world did you go to him and say I want to look at  
11    text messages.  Why did you do that?

12          A     Why did I not?

13          Q     Why did you?

14          A     I didn't go to him.

15          Q     What did you do?  You looked at text  
16    messages.  How did you go about getting that  
17    accomplished?

18          A     I -- I looked at my text messages.

19          Q     Using the software that he directed you  
20    to?

21          A     I looked at them I believe through the  
22    software, but also --

1           MR. KLEIN: Without revealing  
2       communications -- if you want to answer regarding  
3       anything we did, you cannot disclose any  
4       communications.

5           THE WITNESS: I'm not sure I understood  
6       that.

7           MR. KLEIN: Can we take a moment so I can  
8       get clarity on a privilege issue.

9           (Brief pause.)

10       BY MR. MACGILL:

11           Q     So how did you know to go to use this  
12       particular software? Was it Mr. Brian Kim who  
13       told you that this software is available?

14           A     Yes.

15           Q     All right. And then you took advantage  
16       of what he told you and looked at the text  
17       messages involving these four parties, right?

18           A     Yes.

19           Q     And you weren't reviewing just screen  
20       shots of them, you were reviewing the full text  
21       streams that you were interested in; is that  
22       right?



1           A       I don't know that they had the full text  
2 streams. I'd have to -- each one would be -- I  
3 would have to look at.

4           Q       But you were looking at text messages,  
5 not screen shots of text messages; is that right?

6           A       No. They would be screen shots;  
7 otherwise, to look at the text message you would  
8 have to be looking at the device.

9           Q       How much time did you spend looking at  
10 those text messages?

11          A       Including emails and documents, I  
12 probably spent more than five hours. Perhaps  
13 upwards of ten hours looking at documents.

14          Q       Including text messages from the four  
15 parties you mentioned?

16          A       That would have been part of what I  
17 reviewed.

18                   (HOLSKE Exhibit Number 6 was marked for  
19 identification.)

20 BY MR. MACGILL:

21          Q       Sir, I'm going to hand you Exhibit 6.  
22 Sir, do you recognize Exhibit 6?

1           A     If you give me a moment, I just to  
2     review it.

3           Q     Yeah.   Sure.

4           A     Okay.

5           Q                    REDACTED

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19           Q     Okay.  So I want to be very specific  
20     now.  As of this point in time in your  
21     investigation had you identified any abuse by  
22     executive committee members during the 2000 to

1 2021 period of time?

2 A I'm sorry. Can you repeat that?

3 Q So you were engaged -- you had a 21-year  
4 look-back period for your work, right?

5 A That's correct.

6 Q Two decades in a year, right?

7 A Yes.

8 Q So as of February 11th --

9 A Two decades and six months.

10 Q Okay. Two decades and six months. So  
11 during that two-decade-and-six-month period of  
12 time as of February 11th, had you identified any  
13 abuse allegations that were new in addition to  
14 what the SBC already had?

15 A In addition to the incident involving  
16 Dr. Hunt, you mean?

17 Q Yeah. Did you have anything. I mean  
18 did you have any -- I just want to know. Did you  
19 have nothing at that point in time?

20 A I may have had Dr. Hunt's identity at  
21 this time. I don't -- there was a series of  
22 conversations where REDACTED was scared about

1     retaliation, was concerned for his wife. He  
2     didn't immediately come out with all the facts and  
3     so I -- at this -- when this particular text took  
4     place, I can't tell you, sitting here at this  
5     moment, how much I knew at that time.

6           Q     So you may not have understood my  
7     question. Or maybe you did and gave the answer  
8     you did, but let me just restate it.

9           A     Okay.

10          Q     For this, you were involved in an  
11     investigation involving a  
12     two-decade-plus-six-month period of time, right?

13          A     Yes, sir.

14          Q     On February 11th, 2022, how many abuse  
15     allegations did you have that you had uncovered  
16     through your work on this investigation since  
17     October that were in addition to what the SBC  
18     already had?

19          A     I had talked to other witnesses about  
20     other sexual abuse allegations besides this one.

21          Q     How many? I've got my pen right here.  
22     I'm going to write them down. I want you to tell

1     this jury and me, and I'll make notes as we go,  
2     how many new allegations of sexual abuse did you  
3     have, sir, prior to February 11th, 2022, that the  
4     SBC did not already have. How many?

5             A     I can't tell you that. I don't know.

6             Q     List one. I'd like to you list one  
7     allegation that you had as of February 11, 2022,  
8     that was new and different from what the SBC  
9     already had?

10            MR. KLEIN: Objection as to form. You can  
11     answer if you know.

12            THE WITNESS: I took other reports of  
13     sexual abuse, and I don't know that I'm comfortable  
14     revealing the names of the parties involved.

15     BY MR. MACGILL:

16            Q     Did you have a single -- can you name a  
17     single one, sir? Whether you're comfortable or  
18     not, the court will tell --

19            A     Cases the sexual abuse?

20            Q     Yeah.

21            MR. KLEIN: Without identifying the name,  
22     you can answer his question.

1

REDACTED

1 engagement with the SBC and run a hotline since  
2 May of 2022, and I've taken a lot of reports from  
3 survivors and advocates, and I just can't remember  
4 the exact cases.

5 BY MR. MACGILL:

6 Q Sir, you prepared for your testimony.  
7 You've met with lawyers, these New York lawyers  
8 twice, right?

9 A Right.

10 Q And now is your opportunity. I want you  
11 to identify for this court and jury any other  
12 allegations of sexual abuse prior to February 11,  
13 2022, that you had identified as a part of your  
14 investigation other than REDACTED incident  
15 that he identified with his wife and this  
16 allegation involving the music minister. Any  
17 others?

18 A This had nothing to do with my  
19 preparation for this testimony today, so I'm sorry  
20 did not prepare to talk about other victims of  
21 sexual abuse during the course of the  
22 investigation.



1           Q       The unvarnished truth of it is, sir --  
2       and to repeat -- the unvarnished truth of this is  
3       you didn't have a single other sexual abuse  
4       allegation other than what you're claiming about  
5       Johnny Hunt prior to February 11, 2022, did you?

6           MR. KLEIN:   Objection as to form.  
7       Mischaracterizes his testimony.

8           THE WITNESS:   That's not correct.

9       BY MR. MACGILL:

10          Q       List every one that you had knowledge of  
11       prior to February 11, 2022.

12          MR. KLEIN:   Objection as to form.   He just  
13       did that.   He can do it again one more time, but he  
14       just answered that exact question.

15          THE WITNESS:   As I told you, I'm not  
16       prepared, I did not prepare in advance to talk about  
17       other sexual abuse victim cases that I encountered  
18       during my investigation prior to the release of the  
19       report during the course of the investigation.

20       BY MR. MACGILL:

21          Q       Now, but the fact is, sir, the  
22       unvarnished truth of this is you had nothing -- to

1 repeat -- you had nothing as of February 11, 2022,  
2 that you could put in this draft report that was  
3 new, did you?

4 MR. KLEIN: Objection as to form. Asked  
5 now three times and answered three times.

6 THE WITNESS: That is incorrect.

7 BY MR. MACGILL:

8 Q REDACTED

it's all I thought and more. You were  
10 expressing enthusiasm about what REDACTED had  
11 told you, right?

12 MR. KLEIN: Objection. Asked and  
13 answered. You can answer.

14 THE WITNESS: Enthusiasm would not be the  
15 correct term.

16 BY MR. MACGILL:

17 Q Okay. But this was just the first or  
18 second interview with the -- first or second of  
19 nine interviews you did with the REDACTE during  
20 the course of your investigation, right? Here on  
21 February 11?

22 A I don't know how many conversations I

1 had had at the time of February 11 at 4:26 p.m.

2 Q Why didn't you include the allegations  
3 pertaining to this music minister in your report,  
4 sir?

5 MR. KLEIN: Objection as to form. You can  
6 answer.

7 THE WITNESS: In the report?

8 BY MR. MACGILL:

9 Q Yes, sir.

10 A I believe it's in the report.

11 Q It's in the report?

12 A I don't know for sure, but it was  
13 something I investigated.

14 Q Now, the SBC recently settled a lawsuit.  
15 You are aware of that settlement that recently  
16 occurred?

17 A I am not aware of the settlement.

18 Q But you are aware of the parties  
19 involved?

20 A I'm not aware.

21 MR. KLEIN: Objection as to form. Give me  
22 a second to object. The court reporter needs some

1 space between our questions and the answers. I  
2 object as to form. You can answer if you know.

3 THE WITNESS: I'm not aware of a  
4 settlement.

5 BY MR. MACGILL:

6 Q All right. Let's pull up those names.  
7 So did your draft report include references to a  
8 Mr. Page, a Mr. Patterson, and a Mr. Pressler as  
9 of May 10, 2022?

10 A I'm sorry. Can you ask me that question  
11 again?

12 Q Yeah. Are you confused about what I'm  
13 asking about when I talk about Page, Patterson,  
14 and Pressler?

15 MR. KLEIN: Objection. That wasn't his  
16 question. He asked if you can say it again, not  
17 that he was confused. Please do not mischaracterize  
18 his question to you. Thank you.

19 BY MR. MACGILL:

20 Q Do you have any confusion about the  
21 names Page, Patterson, and Pressler, sir?

22 A No.

1           Q     And you know that they were in your  
2     draft report on May 10, 2022, weren't they?

3           A     I don't remember.

4           Q     You removed them from your report, did  
5     you not?

6           MR. KLEIN:   Objection as to form.   You can  
7     answer.

8           THE WITNESS:   I am not aware of that.

9     BY MR. MACGILL:

10          Q     So did you review versions of your  
11     report where they were included at one point and  
12     they were taken out in another?

13          THE WITNESS:   Can I answer?

14          MR. KLEIN:    Yes.   You can.

15          THE WITNESS:   I only reviewed documents  
16     related to Dr. Hunt.

17     BY MR. MACGILL:

18          Q     Why was -- why are the allegations as to  
19     Mr. Pressler removed from your report?

20          MR. KLEIN:    Objection as to form.   You can  
21     answer.

22          THE WITNESS:   I don't know.

1 BY MR. MACGILL:

2 Q Did you have any role in that?

3 MR. KLEIN: Objection as to form.

4 THE WITNESS: I did not.

5 BY MR. MACGILL:

6 Q Do you know anybody who did?

7 MR. KLEIN: Objection as to form. It  
8 mischaracterizes his testimony that it was removed,  
9 but you can answer if you can.

10 THE WITNESS: I don't know.

11 BY MR. MACGILL:

12 Q Well, sir, let's look at just some very  
13 basic things. You told us this whole thing that  
14 you were involved with, this entire thing that you  
15 did, involved a period of two decades and six  
16 months. Do you remember that?

17 A The entire thing that I did?

18 Q Yeah. All that you've caused here  
19 relates to that period of time, doesn't it?

20 MR. KLEIN: Object.

21 BY MR. MACGILL:

22 Q The 2000-to-2021 period of time. You

1 understand that, do you not?

2 MR. KLEIN: Objection as to form as to  
3 what "caused" means, but you can answer if you can.

4 THE WITNESS: Your question is not clear  
5 to me.

6 BY MR. MACGILL:

7 Q Your foot -- the footprint of your work  
8 covered what period of time?

9 A The scope of our engagement was from  
10 January 1, 2000, through June -- forgive me --  
11 June 14th, 2021.

12 Q Now, did the Pressler -- was the  
13 Pressler conduct, did that involve -- was  
14 Pressler's conduct occurring, at least in part,  
15 during that period of time?

16 A I had no role in that aspect of the  
17 investigation.

18 Q Why not, sir? You were charged -- it  
19 was on your own interview template, right? You  
20 were supposed to do interviews pertaining to that  
21 period of time. Why did you not include Pressler  
22 in your work, sir.

1           MR. KLEIN: Are you asking him in his  
2 individual capacity or as Guidepost?

3 BY MR. MACGILL:

4           Q     Why didn't you include that, sir?

5           MR. KLEIN: You can answer in your  
6 individual capacity if you know.

7           THE WITNESS: The responsibilities for  
8 investigating the different allegations were shared  
9 among different team members. I had nothing to do  
10 with the Pressler or Patterson matters.

11 BY MR. MACGILL:

12          Q     Who did.

13          A     I do not know.

14          Q     One of your colleagues at Guidepost?

15          A     I assume, yes.

16          Q     You have no knowledge of who was  
17 involved there?

18          A     I don't recall which of the  
19 investigators had Mr. Patterson. I don't recall  
20 which investigator had Mr. Pressler.

21          Q     Now, your CEO was involved in those  
22 matters, right? You saw it with your own eyes



1 emails involving her and Pressler and Patterson,  
2 right?

3 MR. KLEIN: Objection as to form. You can  
4 answer.

5 THE WITNESS: I don't recall any emails  
6 from our CEO on the Pressler and Patterson matters.

7 BY MR. MACGILL:

8 Q So what --

9 A Once again, I was not the investigator  
10 for those allegations.

11 Q What were you the investigator for?

12 A I interviewed several past presidents of  
13 the SBC that fell within the scope of our  
14 engagement including Jack Graham, Morris Chapman,  
15 Steve Gaines, Frank Page, perhaps others.

16 Q And why were you interviewing them?  
17 Were there sexual abuse allegations associated  
18 with them?

19 A We interviewed executive committee  
20 members, including presidents of the SBC, trustees  
21 to the executive committee, employees of the  
22 Baptist Press, sexual abuse survivors, sexual

1 abuse survivor family members, and any other  
2 witnesses willing to come forward and speak to us  
3 about this matter.

4 Q Were any of the four gentlemen that you  
5 mentioned, were they -- did you interview them  
6 pertaining to allegations of sexual abuse by them?

7 A We interviewed all of them and asked  
8 questions related to the five bullets here.

9 Q Okay. You have a section in the report  
10 entitled allegations of abuse committed by  
11 executive committee members. And Frank Page,  
12 there was information drafted as to him in the  
13 report -- in the draft report, right?

14 A I don't recall. I didn't prepare to  
15 talk about Frank Page for today.

16 Q The only name, sir, in the final report  
17 pertaining to "allegations of abuse committed by  
18 executive committee members" was Pastor Johnny  
19 Hunt. Is that right?

20 MR. KLEIN: Objection. Asked and  
21 answered.

22 THE WITNESS: Again, I did not prepare to

1 speak about anything today besides the incident  
2 involving Dr. Hunt.

3 BY MR. MACGILL:

4 Q Well, sir, I'm just asking about the  
5 work you did and all the circumstances that  
6 resulted from the Guidepost report here. Don't  
7 you understand at a very basic level that there's  
8 a section of your report entitled allegations of  
9 abuse committed by the executive committee  
10 members?

11 Do you understand that?

12 MR. KLEIN: Objection as to form. You say  
13 your report. This is not his report. It's  
14 Guidepost's report. But of course, you can ask him  
15 questions about his memory about his individual  
16 role. With that, you can answer.

17 THE WITNESS: I would have to see the  
18 report in its entirety and look to see if there was  
19 anything involving Dr. Frank Page. I don't recall  
20 what ended up in the report related to him.

21 BY MR. MACGILL:

22 Q You were the principal drafts person of

1 this report, were you not?

2 MR. KLEIN: Objection. Mischaracterizes  
3 his testimony. You can answer.

4 THE WITNESS: I was not.

5 BY MR. MACGILL:

6 Q Who was?

7 A The report is several hundred pages long  
8 and several members of the investigative team  
9 provided draft input.

10 Q Who was the principal drafts person,  
11 sir, of the section entitled allegations of abuse  
12 committed by executive committee members?

13 MR. KLEIN: Objection as to form. You can  
14 answer.

15 THE WITNESS: If you are referring to the  
16 event involving Dr. Hunt, Samantha Kilpatrick and I  
17 were the principal drafters of the draft language  
18 involving the incident with Dr. Hunt.

19 BY MR. MACGILL:

20 Q Well, sir, we covered this before. It  
21 sounds like we need to cover it again. So you  
22 testified previously that you were the -- that you

1 drafted the portion of the report related to the  
2 plaintiff, right?

3 A Isn't that what I just said.

4 Q Yeah. That's what you said this morning  
5 and that's what we need to follow up on. That was  
6 the section that you drafted, right?

7 MR. KLEIN: Objection. That's exactly  
8 what we just testified to, but you can ask your  
9 follow-up question.

10 BY MR. MACGILL:

11 Q You understand that. All right. In  
12 what section did that report -- portion of the  
13 report appear.

14 A I don't recall.

15 Q Sir, in black and white terms, we'll  
16 look at it this afternoon. It's Allegations of  
17 Abuse Committed By Executive Committee Members,  
18 isn't it?

19 MR. KLEIN: Objection as to form. He just  
20 answer your question. He can answer it again or you  
21 can show him the document.

22

1 BY MR. MACGILL:

2 Q Answer the question, sir?

3 MR. KLEIN: You can.

4 THE WITNESS: I don't recall the title  
5 under which it was listed. I just remember the  
6 content of the report.

7 BY MR. MACGILL:

8 Q Okay. I'll represent to you, sir, that  
9 the section A allegations of abuse committed by  
10 the executive committee members contains  
11 information reported as to Pastor Johnny Hunt.  
12 And as you sit here today, you have no  
13 recollection that that's where this portion of the  
14 report appeared, right?

15 MR. KLEIN: Objection. Asked and  
16 answered. You can answer.

17 THE WITNESS: I don't.

18 BY MR. MACGILL:

19 Q All right. Now, let's see what else you  
20 don't know or maybe you do know. Now, in prior  
21 drafts of the report -- prior drafts of the report  
22 pertaining to this particular section, Allegations

1 of Abuse Committed by Executive Committee Members,  
2 there were references to these gentlemen, weren't  
3 there -- Mr. Pressler, Mr. Patterson, right?

4 MR. KLEIN: Objection. Is that a  
5 question?

6 THE WITNESS: I don't know.

7 BY MR. MACGILL:

8 Q Well, did you overwrite that portion of  
9 the report where you deleted those two gentlemen  
10 included Pastor Johnny Hunt, sir?

11 MR. KLEIN: Objection. That  
12 mischaracterizes his role and his testimony, but he  
13 can answer again.

14 THE WITNESS: As I told you before, I had  
15 no input on Mr. Patterson -- Dr. Patterson or  
16 Dr. Pressler.

17 BY MR. MACGILL:

18 Q Now, in the second interview with  
19 REDACTED , did you conduct that interview?

20 MR. KLEIN: Objection as to form.

21 THE WITNESS: Second interview. Could you  
22 be more specific.

1 BY MR. MACGILL:

2 Q Well, don't you remember that there were  
3 various interviews that you did. We covered that  
4 this morning. Do you want to go over that again,  
5 sir. I'm happy to do it. Do you want to go over  
6 it again?

7 A What do you mean?

8 Q February 15, 2022, you did an interview  
9 with REDACTED . Do you remember that?

10 A That date doesn't speak to me.

11 Q All right. Well, sir, we went through  
12 this --

13 MR. KLEIN: Can you let him finish --

14 MR. MACGILL: Pull out --

15 MR. KLEIN: Let him finish the answer.

16 MR. MACGILL: Pull out the --

17 MR. KLEIN: Rob, please let him finish the  
18 answer. He's happy to answer any questions you  
19 have.

20 BY MR. MACGILL:

21 Q Pull out the interrogatory answers, sir.  
22 You confirmed that this is true. Pull it out and



1 let's go through it.

2 MR. KLEIN: Rob, I would just ask that you  
3 let him finish his answer, and then, of course, you  
4 can ask any follow-up question you like, please.

5 BY MR. MACGILL:

6 Q Do you have page 3 of this exhibit in  
7 front of you, sir?

8 A I do.

9 Q All right. And do you see -- do you  
10 remember confirming that this, to the best of your  
11 knowledge, was a truthful under-oath answer by the  
12 chief operating officer of your company?

13 A Yes.

14 Q And you trust his word?

15 A Yes.

16 Q Okay. Now, interrogatory two:  
17 Complainant's husband. Do you see that entry of  
18 February 15, 2022?

19 A I see the entry.

20 Q And you did any interview that day,  
21 right?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I documented a conversation,  
3 yes.

4 BY MR. KLEIN:

5 Q And you did an interview that day?

6 MR. KLEIN: Objection. Asked and  
7 answered.

8 THE WITNESS: I documented a conversation.

9 BY MR. KLEIN:

10 Q Okay. So you didn't do an interview.  
11 You documented a conversation? Why didn't you  
12 interview him on that day?

13 A I would need to see the document that's  
14 referred to in the last column to characterize  
15 accurately what happened on the 15th of February.

16 Q Why in your mind, sir, is there a  
17 difference between documenting a conversation and  
18 an interview?

19 A Perhaps on that date -- a conversation  
20 can happen where you say I need a name, a full  
21 name, a contact number. I don't know what that  
22 conversation entailed that particular day.

1           Q     Okay. Now, did you do a joint interview  
2 of the REDACTED with Samantha Kilpatrick on  
3 March 31?

4           A     Yes.

5           Q     And did you create notes of that?

6           A     Yes.

7           Q     And you were in person for that  
8 interview?

9           A     Yes, sir.

10          Q     And where did you go?

11          A     I went to Eatonton, North Carolina.

12          Q     And did Ms. Kilpatrick attend with you?

13          A     She did.

14          Q     Now, I take it this was an hour? two  
15 hours? What was it? How long was that interview  
16 there on March 31.

17          A     I remember it being an entire day.

18          Q     You met with the two of them for an  
19 entire day in Eatonton, North -- South Carolina or  
20 North Carolina, I should say.

21          A     Yes. I don't recall exactly the number  
22 of hours and number of minutes, but I recall it

1 being a long -- a long day.

2 Q Did you have typed notes -- notes typed  
3 up from this interview?

4 A Yes.

5 Q It says here documents and notes. Do  
6 you think it was not handwritten notes? Do you  
7 think it was typewritten notes on that day.

8 A I remember having my laptop with me on  
9 that trip.

10 Q Okay. And you took notes during the  
11 conversation with them?

12 A Correct.

13 Q Okay. Now, you did another joint  
14 interview of the REDACTED on April 5, 2022; is that  
15 right?

16 A Yes.

17 Q And that was with Ms. Kilpatrick, right?

18 A Yes.

19 Q And then you have an interviewee, you  
20 say the plaintiff. Who is the plaintiff?

21 A That's Dr. Hunt.

22 Q REDACTED - --

1 MR. KLEIN: Hold on. I ask you not to --

2 MR. MACGILL: I agree.

3 MR. KLEIN: I appreciate it, Rob.

4 MR. MACGILL: I agree.

5 MR. KLEIN: Thank you, sir.

6 BY MR. MACGILL:

7 Q Okay. Now, you had an interview with  
8 Mr. Blankenship on May 9th, 2022; is that right?

9 A Yes.

10 Q And that was in person?

11 A Yes.

12 Q Was that all day?

13 A No. He limited that conversation. He  
14 stated he would only talk to us for 20 minutes,  
15 but we ended up speaking to him for 45 minutes.

16 Q Sir, with respect to Mr. Blankenship,  
17 how did you arrange for the interview? Did you  
18 call ahead of time and say we'd like to meet with  
19 you, give him the courtesy of head-up notice, that  
20 kind of thing?

21 MR. KLEIN: Objection as to form. You can  
22 answer.

1           THE WITNESS: We initially emailed him  
2 asking him to meet with us, so he knew that we  
3 wanted to speak to him about this matter.

4 BY MR. KLEIN:

5           Q     And what happened?

6           A     He replied regarding his availability,  
7 his work schedule, and that he would need to get  
8 back in touch with us.

9           Q     And did he?

10          A     No.

11          Q     So how did you arrange then for a  
12 meeting with him if he didn't respond to you?

13          A     We went to his office.

14          Q     Uninvited?

15          A     Yes.

16          Q     Why would you go to his office  
17 uninvited?

18          A     To speak to him.

19          Q     So you traveled -- and your home is  
20 what? You live here in the Washington, D.C. area?

21          A     I did at the time.

22          Q     And so you and Ms. Kilpatrick got on a

1 plane and went to Georgia to meet with him  
2 uninformed?

3 A I took a plane to get to Georgia.

4 Q Did she also?

5 A I believe yes.

6 Q How did you know you were going to be  
7 able to meet with Mr. Blankenship if he had not  
8 agreed to a meeting?

9 A We did not know that we would be able  
10 to.

11 Q Then how did you -- did you force a  
12 meeting somehow?

13 A No. We did not force a meeting.

14 Q Well, how did you get -- if you -- you  
15 weren't invited and the meeting wasn't agreed to,  
16 how did you have a meeting then, sir?

17 A We approached him on public property,  
18 asked him if he would be willing to speak to us.

19 Q When you approached him, where did you  
20 approach him?

21 A Outside of his office.

22 Q When you say outside of his office,

1 where were you and where was he?

2 A Kennesaw, Georgia.

3 Q Right. Were you on a sidewalk or --  
4 where were you?

5 A Sidewalk.

6 Q Who was there on the sidewalk?

7 A Me, Samantha Kilpatrick and Roy  
8 Blankenship.

9 Q What did you do to him to get him to  
10 talk to you then? You're on the sidewalk. How do  
11 you then cause a conversation to take place when  
12 you are not invited and there's a meeting that has  
13 not been agreed to. How does that happen?

14 A We didn't do anything to him first. We  
15 identified ourselves.

16 Q When? When did you identify yourself?

17 A When he encountered him on the sidewalk.

18 Q Well, did he walk out of an office  
19 building?

20 A Correct.

21 Q Oh, so you were waiting for him when he  
22 walked outside his own office building?



1 A That would be fair to say.

2 Q Was he surprised to see you?

3 A I don't know how he felt about it.

4 Q Fair enough. Did he know who you were  
5 when he walked outside his office building?

6 MR. KLEIN: Objection as to form. You can  
7 answer.

8 THE WITNESS: I don't know.

9 BY MR. KLEIN:

10 Q Okay. Well, how did you engage him in  
11 conversation then?

12 A As I said before, we identified  
13 ourselves as employees of Guidepost Solutions and  
14 that we wanted to speak to him pursuant to the  
15 prior email contact.

16 Q What did he say?

17 A He listened.

18 Q And what happened?

19 A He agreed to speak to us.

20 Q Where?

21 A Inside his office.

22 Q How long did that conversation take

1 place?

2 A As I said earlier, 45 minutes  
3 approximately.

4 Q Did you take notes?

5 A I did.

6 Q Who else took notes?

7 A Samantha Kilpatrick.

8 Q And this meeting was -- this meeting  
9 took place how long after the incident at issue?

10 A Eleven years and approximately nine  
11 months.

12 Q Did you tell him that you had a tape  
13 recording of the interview that REDACTED had  
14 procured of the meeting back in 2010?

15 A I didn't.

16 Q Why didn't you tell him, sir? Wouldn't  
17 that have been a fair way to approach this, to  
18 say, look, you need to know I have a tape  
19 recording of the conversation between you and  
20 REDACTED and his wife. Did you tell him that?

21 MR. KLEIN: Objection as to form. You can  
22 answer.

1           THE WITNESS: No. But we told him that we  
2 had a signed waiver from the REDACTED and that we'd  
3 like to speak to him.

4 BY MR. KLEIN:

5           Q Did you tell him you had a signed waiver  
6 from Johnny Hunt?

7           A I didn't have a signed waiver from  
8 Johnny Hunt.

9           Q Well, why didn't you tell him that you  
10 need to know that in terms of this counseling  
11 session, I just have one waiver, not the other?  
12 Why didn't you tell him that?

13           MR. KLEIN: Objection as to form. Your  
14 can answer.

15           THE WITNESS: Because the counseling  
16 sessions that we have recordings for didn't involve  
17 Dr. Hunt. He wasn't present during the counseling  
18 sessions.

19 BY MR. KLEIN:

20           Q He wasn't present during any of the  
21 counseling sessions?

22           A The ones that I listened to that were

1 provided by REDACTED , I don't remember  
2 hearing the voice of Dr. Hunt on those recordings.

3 Q Let me make sure I understand. Are you  
4 saying that at the time you wrote the report you  
5 did not know whether Johnny -- Pastor Johnny Hunt  
6 was in the room during the time the conversation  
7 was taped?

8 A He was not in the room.

9 Q You are certain of that?

10 MR. KLEIN: What room are you talking  
11 about? The room where the audio recordings?

12 BY MR. MACGILL:

13 Q Yeah.

14 A The counseling sessions were between Roy  
15 Blankenship after the incident on July 25th, and  
16 the parties present were REDACTED  
17 REDACTE , and Roy Blankenship.

18 Q Okay. Did you -- did you describe to  
19 Mr. Blankenship the content of that tape recording  
20 in any way?

21 A No.

22 Q Did you describe that there was no

(Whereupon, a luncheon recess was  
taken.)

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1 complaint about Johnny Hunt in the tape recordings  
2 that you'd heard with your own ears?

3 A We didn't discuss the recordings with  
4 Roy Blankenship.

5 Q Well, sir, you knew -- you knew as a  
6 matter of fact -- you'd heard with your own ears  
7 that there was no complaint about Johnny Hunt and  
8 any sexual abuse or sexual encounter in the tape  
9 recordings that you heard, right?

10 MR. KLEIN: Objection as to form. You can  
11 answer.

12 THE WITNESS: I don't recall whether in  
13 nose recordings that I listened to back in the  
14 spring of 2022 if during those conversations that I  
15 listened to whether either Roy Blankenship, REDACTE  
D  
said the name Johnny Hunt.

17 BY MR. KLEIN:

18 Q Are you saying because this occurred  
19 approximately two years you have some inability to  
20 remember what was on those tape recordings?

21 MR. KLEIN: Objection as to form. You can  
22 answer.

6 Q Okay. But I'm asking you something  
7 different, and I hope you understand that. I'm  
8 asking you whether you gave the simple courtesy to  
9 Mr. Blankenship to say that, with respect to  
10 recordings made in 2010, there is no reference by  
11 REDACTED to any form of sexual abuse in that  
12 tape recording.

15 THE WITNESS: We did not talk about the  
16 recordings.

Q Why wouldn't you as a matter of being  
fair and forthright in your investigatory approach  
to explain I have evidence, Mr. Blankenship about  
what actually occurred in 2010, and this evidence  
is a tape recording. Why didn't you tell him

THE WITNESS: The tape recordings were counseling sessions between Mr. Blankenship and REDACTED subsequent to the incident involving Dr. Hunt. And I don't recall whether Dr. Hunt's name was ever mentioned. So that was not an element that I utilized to interview Mr. Blankenship. I used other elements of information I had received prior to May 9th to ask him very direct questions about the incident on July 25th, 2010.

15 Q But sir, you had actual evidence as what  
16 was spoken 12 years prior that you had and Mr.  
17 Blankenship did not have. Why did you, sir, not  
18 as a matter of common courtesy or good  
19 investigatory practice simply say to Mr.  
20 Blankenship I have a recording, I'd like you to  
21 listen to it.

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1 and answered several times. Please stop badgering  
2 the witness. I'd ask him not to answer that  
3 question. You've asked it several times now.

4 BY MR. KLEIN:

5 Q Answer the question, sir.?

6 MR. KLEIN: You can answer one more time.

7 THE WITNESS: The evidentiary value of  
8 those recordings was that Roy Blankenship had in  
9 fact acted as a counselor subsequent to July 25th,  
10 2010 with REDACTED .

11 BY MR. KLEIN:

12 Q You sow no evidentiary value, as you  
13 say, using your term, to the tape recording itself  
14 that was made in 2010?

15 A The evidentiary value was the fact that  
16 in fact Roy Blankenship acted as a counselor  
17 subsequent to the incident with REDACTED

19 MR. MACGILL: Why don't we go ahead and  
20 take a break.

21 VIDEOGRAPHER: We are now off the record  
22 at 12:43.

A F T E R N O O N S E S S I O N

(1:34 p.m.)

VIDEOGRAPHER: We're now back on the  
record at 13:34.

WHEREUPON,

RUSSELL HOLSKES  
was called for continued examination, and having  
been previously duly sworn, was examined and  
testified further as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFF

CONTINUED

BY MR. MACGILL:

Q Sir, I want to go to the March 31, 2022  
interview you had an all day interview with the

REDACTED ; is that right?

A Yes.

Q And that was in person?

A Yes.

Q Did you review every document they  
provided to you prior to the time you had that  
meeting?

MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I had reviewed every  
3 document provided prior to that day, prior to the  
4 meeting.

5 (HOLSKE Exhibit Number 7 was marked for  
6 identification.)

7 BY MR. MACGILL:

8 Q Okay. I'm going to hand you the next  
9 exhibit. So this is Exhibit 7. Can you tell us  
10 what Exhibit 7 is?

11 A This is a narrative document  
12 describing --

13 Q REDACTED

16 A Correct.

17 Q When did they provide this to you, sir?

18 A On March 31.

19 Q Did you have access to this document  
20 when you authored the report?

21 A Yes. I would have had the report  
22 available.

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14                   (HOLSKE Exhibit Number 8 was marked for  
15                   identification.)

16       BY MR. MACGILL:

17           Q       All right. Let's take a look at the  
18       next exhibit. Can you tell us what Exhibit 8 is?

19           A       This is the published report by  
20       Guidepost Solutions to the Southern Baptist  
21       Convention.

22           Q       And is this -- with respect to the

1 journal that we referred to previously --

2 MR. KLEIN: When you say journal, Rob, are  
3 you referring to Exhibit 7?

4 MR. MACGILL: Exhibit 8.

5 MR. KLEIN: You said journal, so I --

6 MR. MACGILL: Yeah. Let me get --

7 MR. KLEIN: No problem.

8 (HOLSKE Exhibit Number 9 was marked for  
9 identification.)

10 MR. MACGILL: My mistake it's Exhibit 9.

11 BY MR. MACGILL:

12 Q Can you tell us what Exhibit 9 is, sir?

13 A This is a journal that was on the hard  
14 drive that REDACTED provided to Guidepost.

15 Q And when did you first get access to  
16 this?

17 A I don't remember the date.

18 Q Now, do you know when the -- when this  
19 journal was offered?

20 A According to forensic review it was  
21 between the years 2009 and 2011, but I did not  
22 conduct that review.

1           Q       When you say -- who did a review of  
2       Exhibit 9?

3           A       I can't say for certain.

4           Q       You say it was a forensic review? Was  
5       it review by somebody in your firm?

6           A       I believe so.

7           Q       And who in your firm would have been  
8       would have had the skills to do a "forensic  
9       review"?

10          A       We have more than one person that has  
11       that skill set. I do not possess that skill set,  
12       so I'm not sure.

13          Q       What is a forensic review?

14          A       It would include determining when a  
15       record was created -- digital record was created.

16          Q       And you believe, based on the forensic  
17       review, this record was created sometime between  
18       2009 and 2011?

19          A       That's the feedback I got.

20          Q       Did you review these journal entries on  
21       Exhibit 9 prior to the time that you authored your  
22       portion of the report?

1           A     Yes.

2           Q     Did you have access to Exhibit 9 during  
3 the entire time you did your report?

4                   MR. KLEIN:  Objection as to form.

5 BY MR. MACGILL:

6           Q     Did you have access to these -- to  
7 Exhibit 9 during the time you were working on the  
8 report?

9           A     Yes.

10                   (HOLSKE Exhibit Number 10 was marked for  
11 identification.)

12 BY MR. MACGILL:

13           Q     Sir, I'm going to hand you what's been  
14 marked as Exhibit 10.

15                   Sir, this is a series of emails.  Do you  
16 recognize this email -- if you look at the backside,  
17 which is Bates 14527, there's an email from you to  
18 yourself, Krista Tongring, Julie Wood Myers or Julie  
19 Myers Wood, and Samantha Kilpatrick.

20                   Do you see that?

21           A     I do see it.

22           Q     And this is an email, an invitation

1 invite?

2 A Yes.

3 Q And looking at this, do you remember  
4 what you were conversing about?

5 A Just sharing what information we had  
6 obtained the day before.

7 Q And this was after your all-day,  
8 in-person meeting with the REDACTED ?

9 A This email was authored the day after.

10 Q And you say at the bottom of page 2 that  
11 you're trying to set up a meeting with Mr. Hunt;  
12 is that right? A Hunt discussion?

13 A No. I'm seeking a time that I can talk  
14 to Krista Tongring and Julie Myers Wood with  
15 Samantha Kilpatrick present.

16 Q My mistake. But this was scheduling a  
17 time to talk about Pastor Johnny Hunt; is that  
18 right?

19 A It was about scheduling a time for the  
20 four of us to talk about what we had learned the  
21 day before, which includes information about  
22 Dr. Hunt.



1 Q On the back page you say specifically --  
2 the subject is Hunt Discussion. Do you see that?

3 A Correct.

4 Q And what about Dr. -- what about Pastor  
5 Johnny Hunt were you aiming to speak about?

6 A What we had learned the day before from  
7 REDACTED involving  
8 Dr. Hunt.

9 Q Why did you want to have all four of you  
10 have a conversation rather than a just subset of  
11 this group?

12 A Well, Samantha Kilpatrick was with me  
13 that day. Krista Tongring was the project  
14 manager, and Julie Wood was providing oversight  
15 for the entire investigation.

16 Q Now at this time, April 1st, 2022, the  
17 allegations that the REDACTED were -- made this a  
18 unique case as far as you were concerned, right?  
19 That is, the Hunt circumstances?

20 MR. KLEIN: Objection as to form. You can  
21 answer.

22 THE WITNESS: It was unique with respect

1 to my experience up until that date in that I had  
2 not received or I had been involved with an  
3 allegation against an executive committee member as  
4 outlined in the first bullet of the scope of our  
5 engagement.

6 BY MR. MACGILL:

7 Q So this was the first time, April 1st,  
8 2022, that you found a case that would meet the  
9 particular requirements of the engagement letter  
10 that you've outlined?

11 MR. KLEIN: Objection. Mischaracterizes  
12 his testimony. You can answer.

13 THE WITNESS: No there were other  
14 instances that would have been covered under the  
15 second through fifth bullets of the scope, but this  
16 was the only one having to do with the first bullet  
17 in my experience up until that date.

18 BY MR. MACGILL:

19 Q All right. So this, as of April 1,  
20 2022, in terms of all the work that you'd been  
21 doing in this matter since October 2021 this was  
22 the only case that met the requirements, or the

1 bullet point as you say, "Allegations of Abuse by  
2 Executive Committee Members"; is that correct?

3 MR. KLEIN: Objection as to form.

4 THE WITNESS: That I was involved with  
5 directly.

6 BY MR. MACGILL:

7 Q Are you aware of anyone else involved in  
8 any other allegations in connection with this  
9 particular investigation involving allegations of  
10 abuse by executive committee members?

11 A I don't know.

12 Q You don't have any knowledge of any such  
13 example.

14 A I did my work, my contribution. I'm not  
15 sure what all the other team members accomplished.

16 Q But as far as you know, sitting here  
17 today, you know of no other case that would -- no  
18 other case that was investigated that would meet  
19 the allegations of abuse by executive committee  
20 members criterion?

21 MR. KLEIN: Objection. Asked and answered  
22 you can answer.

1 THE WITNESS: I don't know.

2 BY MR. MACGILL:

3 Q When you say you don't know, you don't  
4 know of any other case, right?

5 A I don't know.

6 Q Okay. So I'm going to take by your  
7 answer that you don't know of any other case  
8 involving allegations of abuse by executive  
9 committee members as you sit here today.

10 Do you have any reason to correct me on  
11 that?

12 MR. KLEIN: Objection as to form. You can  
13 answer.

14 THE WITNESS: You seem to have made  
15 reference to some earlier, so it's possible that  
16 there were others. But in my experience I don't  
17 know.

18 BY MR. MACGILL:

19 Q Okay. Now, your words April 1 you said:  
20 There's no other case like this to the best of my  
21 knowledge and we need to decide how to proceed?

22 Do you see that?

1           A     Correct.

2           Q     When you said there is no other case  
3 like this, what did you mean?

4           A     In my experience from the time I got  
5 involved in this engagement up until that date, I  
6 had not been made aware of a similar case.

7           Q     All right. And you then said, we need  
8 to decide how to proceed. Do you see that?

9           A     I do see that.

10          Q     What needed to be decided as far as you  
11 were concerned.

12          A     Next steps.

13          Q     Well, why did you -- why was this -- why  
14 did you need to have four people on the phone,  
15 including the CEO of the company, to make this  
16 decision on how to proceed?

17          A     Because we had an instance of alleged  
18 sexual abuse by a member of the executive  
19 committee. And as I had just mentioned previous,  
20 in my experience up until that date, I had not  
21 encountered that.

22          Q     Okay. And at this point what you had

1 was you had an interview with REDACTED and  
2 an interview -- you had interviews with REDACTED  
3 REDACTE and REDACTED at this point pertaining  
4 to -- at this point pertaining to this allegation?

5 A Yes.

6 Q And you had not done any other  
7 interviews as of this point in time to corroborate  
8 what they had to say.

9 A Other than speaking to REDACTED and  
10 REDACTE I had not spoken to any other witness.

11 Q As of this time?

12 A As of March 31st.

13 Q Now, ultimately did you have a meeting  
14 with the CEO of company, Guidepost, to determine  
15 how top proceed?

16 MR. KLEIN: Objection. At what point? At  
17 the point listed in this email or any time?

18 BY MR. MACGILL:

19 Q At any time after April 1st?

20 A I would have had a discussion with  
21 Krista Tongring and Julie Wood and Samantha  
22 Kilpatrick and I.

1 Q What happened in that discussion?

2 A We shared what we had heard on the 31st,  
3 the explanation by REDACTED on what she  
4 experienced in graphic detail on July 25th, 2010.

5 Q When you say in graphic detail, did she  
6 tell you what she experienced?

7 A Yes.

8 Q And so you were relying on her spoken  
9 word in addition to Exhibit 9.

10 A No.

11 Q You were relying just on her spoken  
12 word?

13 A No. We relied on Exhibit 7, we relied  
14 on prior conversations with REDACTED, and we  
15 relied on her description of what she experienced  
16 with Dr. Hunt on July 25th, 2010.

17 Q So what was decided when all of you --  
18 when you spoke with the CEO about next steps after  
19 April 1st?

20 A I think that initial conversation was us  
21 explaining, as I mentioned, what we -- what we  
22 heard the day before from the REDACTED and

1           REDACTED           and informed them so they could  
2 absorb that information. And I don't know if we  
3 actually determined next steps at that -- in that  
4 initial discussion or we circled back after they  
5 had time to digest what they heard from us.

6           Q       All right. Did you then -- was there a  
7 subsequent interview of REDACTED ?

8           A       I did not interview -- I was party to a  
9 conversation, a phone call, that may have been  
10 very limited in content after that date. But a  
11 full-blown interview similar to what we  
12 experienced on March 31st where she explained in  
13 graphic detail what she experienced on July 25th,  
14 2010, no.

15          Q       So on April 4, 2023, did Samantha  
16 Kilpatrick do an interview with REDACTED ?

17          A       Can I refer to the document from the Mr.  
18 Collura.

19          Q       Exhibit 1. Yes.

20                 MR. KLEIN: Just for the record, I believe  
21 you said April 4, 2023. Did you mean 2022?

22                 MR. MACGILL: 2022. Yeah.



1 MR. KLEIN: Just for the record.

2 THE WITNESS: In looking at this document  
3 under interrogatory number two, I can see that a  
4 telephonic contact took place between REDACTED  
5 and Samantha Kilpatrick. This document is dated  
6 April 4, 2022.

7 BY MR. MACGILL:

8 Q All right. And did you see notes of  
9 that conversation yourself?

10 A At some point in time I did see those  
11 notes.

12 Q All right. Now is this the fifth  
13 interview with the REDACTED? April 4, 2022?

14 A I can't put an exact number on it right  
15 here.

16 Q All right. Well, if you look at the  
17 interrogatory response, you have your interview on  
18 February 11th. That's one, right?

19 A Uh-huh.

20 Q You have then another interview with  
21 complainant's husband -- that's two -- on  
22 February 15th; is that correct?

1           A       So a -- there's a conversation,  
2       telephonic conversation, between Samantha  
3       Kilpatrick and REDACTED , as it says here,  
4       prior to March 31st, 2022. So one, two, three --  
5       April 4th would have been the fifth document of  
6       conversation with one of the two REDACTED .

7           Q       Okay. So now from February 11 to  
8       April 4, you have five interviews of either or  
9       both of the REDACTED ?

10               MR. KLEIN: Objection as to form.  
11       Mischaracterizes the testimony of it being an  
12       interview. But he can answer.

13               THE WITNESS: Documents a discussion  
14       between the parties that you mentioned.

15       BY MR. MACGILL:

16           Q       Now, let's go back to interrogatory  
17       number two. Look at the top. Could you read  
18       aloud the first two lines -- could you read the  
19       first question there, sir?

20           A       Did Guideposts conduct any interviews of  
21       the complainant Johnny Hunt or any other person  
22       related to the claimant's allegation. If so,

1 identify the date --

2 Q That's enough, sir. So the question was  
3 to ask about interviews, right? And so the answer  
4 was, as you understood it, the chief operating  
5 officer described interviews of the REDACTED here,  
6 right?

7 A That's correct.

8 Q Now, so the fifth interview of the  
9 REDACTED, either or both of the REDACTED, that  
10 occurred as of April 4, 2022; is that right?

11 A Yes.

12 Q Was there a sixth interview of the  
13 REDACTED?

14 A Yes.

15 Q When was that, sir?

16 A April 5th, 2022.

17 Q Did you participate in that  
18 sixth interview?

19 A Yes.

20 (HOLSKE Exhibit Number 11 was marked for  
21 identification.)

22

1 BY MR. MACGILL:

2 Q Let's take a look at the next exhibit.  
3 This will be Exhibit 11, sir.

4 Okay, sir. Is Exhibit 11 a draft of  
5 your -- of the Guidepost report that was drafted as  
6 of REDACTED ?

7 A I'm seeing this report for the first  
8 time. So I don't know exactly 14 pages of -- 15  
9 pages of content -- exactly what it is.

10 (HOLSKE Exhibit Number 12 was marked for  
11 identification.)

12 BY MR. MACGILL:

13 Q I'm going to hand you Exhibit 12. Sir,  
14 I'm going to ask you to compare the Bates number  
15 on Exhibit 11 and Exhibit 12. Do you see the  
16 Bates number GP004328 on Exhibit 11?

17 A GP004328. Is that what you said? Yes.

18 Q Yes. And then look at Exhibit 12.

19 A Yes.

20 Q Do you recognize this as a metadata  
21 sheet for this particular exhibit.

22 A It appears as one. I'm not very well

1       versed in that, but it appears as one.

2               Q       Is this -- is this the metadata, sir,  
3       for that particular report?

4               MR. KLEIN:   Objection as to form.   You can  
5       answer if you know.

6               THE WITNESS:   I don't know.

7       BY MR. MACGILL:

8               Q       On the right-hand side you see the  
9       file -- the date time?

10              A       Yes, sir.

11              Q       And do you see the file name draft

12       REDACTED

13              A       I do.

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      E  
     D  
     A  
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     E

18              Q       Okay.   So sir, I'm going -- you can -- I  
19       will tell you that we don't have the custodian as  
20       yet.   We'll hopefully get that eventually.   But do  
21       you recognize this now that you have this Exhibit  
22       11 in your hand as the status of the draft report

1 as of that date?

2 A I don't know because this is the first  
3 time I'm ever seeing it. I don't know exactly  
4 what it is.

5 Q But you see in the metadata -- I'll  
6 represent Exhibit 12 is the metadata -- shows a  
7 datetime creation of REDACTED . Do you see  
8 that?

9 MR. KLEIN: Objection. Asked and  
10 answered. You can answer.

11 THE WITNESS: I see it.

12 BY MR. MACGILL:

13 Q Sir, look at Bates number GP4344?

14 MR. KLEIN: Is that within Exhibit 11?

15 MR. MACGILL: Yes.

16 THE WITNESS: Page 14?

17 MR. MACGILL: Page 4 --4344. Yeah.

18 Page 14.

19 THE WITNESS: Yeah.

20 BY MR. MACGILL:

21 R

22 A I do.

1           R  
          E  
          D

3       Do you see that?

4           A       I do.

5           Q       And did you draft this portion of this  
6       particular report on April 6th?

7           A       I did not draft it. This the first time  
8       I'm seeing it.

9           Q       Well, and this, sir, says underneath

10                   REDACTED

16          A       I see it.

17          Q       Is that a true statement in this draft  
18       document that has been produced to us by  
19       Guidepost?

20               MR. KLEIN: Objection. He said he hasn't  
21       seen this document before, but you can answer if you  
22       know.

1                   THE WITNESS: So I -- we just discussed  
2                   that I had interviewed               REDACTED  
3                   REDACT in the days before April 5th, 2022. That is  
4                   not in this draft. That's all I can say for  
5                   certain.

6                   BY MR. MACGILL:

7                   Q       Right. But what we know, he absolutely  
8                   know for certain, sir, that this is a document  
9                   that has been produced by your company to us in  
10                  this litigation. We know that. I'll represent it  
11                  to be true. And we have the metadata for this  
12                  Exhibit 12, and we have Exhibit 11. And we have a  
13                  business document from you and your company --  
14                  from your company I should say, that says:

15   REDACTED

18   Do you see that?

19                  A       I see it.

20                  Q       Do you have any reason to doubt the  
21                  veracity of the statement made by this document  
22                  maintained by your company in the ordinary course



1 of business?

2 MR. KLEIN: Objection as to form. You can  
3 answer.

4 THE WITNESS: The veracity of it? I don't  
5 question the veracity of it. I question the  
6 accuracy of it.

7 BY MR. MACGILL:

8 Q Okay. Well, so let's look at this. At  
9 the time this was written and given to us in this  
10 lawsuit, you'd had as of this time at least five  
11 interviews with the REDACTE at this point. Had  
12 you not?

13 A Correct.

14 Q And maybe a sixth one on April 5th,  
15 right? Because this document is April 6th, isn't  
16 it?

17 A Correct.

18 Q So it's better and more fair to be  
19 accurate to the reality of what happened here is  
20 to say to this court and to this jury there are  
21 six interviews of the REDACTE, either individually  
22 or together, that occurred prior to the time of

1 the dates that appear through the metadata  
2 exhibit, Exhibit 12, right?

3 A Can you repeat the question.

4 Q I can see with my own eyes on Exhibit 11  
5 that there is a specific statement: REDACTED

8 Do you see that with your own eyes here,  
9 sir?

10 A Sorry.

11 Q And you've admitted already that as of  
12 this time there had been six interviews with  
13 either with the REDACTE individually or together  
14 as of that time. Right?

15 A I did state that there were interviews  
16 prior to that date.

17 Q All right. Now, as of this time you  
18 have now had -- well, how many months? Your first  
19 discussion with the REDACTE was on the 11th of  
20 February?

21 MR. KLEIN: Objection. Asked and  
22 answered, but you can answer again.

1 THE WITNESS: On or about  
2 February 11th was my first conversation with REDACTE  
D

4 BY MR. MACGILL:

5 Q You never took a step to interview the  
6 Pastor Johnny Hunt during the month of February,  
7 did you?

8 A I don't know if that's accurate.

9 Q Do you recall taking any steps to  
10 interview Pastor Johnny Hunt during the month of  
11 February 2022?

12 A The arranging of interviews of executive  
13 committee members, including past presidents was  
14 not done by me. We had someone else dedicated in  
15 an administrative capacity in trying to set up  
16 current and future interviews with people in those  
17 positions. I was not involved so I don't know  
18 when that process initiated with respect to  
19 Dr. Hunt.

20 Q So you maybe anticipated my next  
21 question. Dr. Hunt wasn't interviewed in February  
22 or March or April regarding the alleged sexual

1 incident, right?

2 A He was interviewed in April.

3 Q But he wasn't interviewed on the  
4 incident involving the REDACTED at that time, was  
5 he?

6 A The specifics of it, no.

7 Q No. So you did an interview with  
8 respect to all that you are doing. You didn't  
9 take one minute of time to interview Dr. Hunt in  
10 February, did you, sir?

11 MR. KLEIN: Objection. Asked and  
12 answered.

13 THE WITNESS: He was not interviewed in  
14 February.

15 BY MR. MACGILL:

16 Q You also will admit, just so everyone  
17 hears it from you, you didn't interview Dr. Hunt  
18 in March, did you, sir?

19 MR. KLEIN: Objection as to form.  
20 Everybody already heard it from him, but they can  
21 hear it again. He can give answer.

22 THE WITNESS: He wasn't interviewed in

1 March.

2 BY MR. MACGILL:

3 Q By you or anyone else at Guidepost?

4 MR. KLEIN: Objection as to form.

5 THE WITNESS: Not by me.

6 BY MR. MACGILL:

7 Q He wasn't introduced by you on matters  
8 associated with this incident or anyone at  
9 Guidepost to you knowledge in the month of  
10 April 2022, was he?

11 MR. KLEIN: Objection --

12 THE WITNESS: That's not accurate.

13 MR. KLEIN: -- as to form. let me get my  
14 objection in and then you can answer.

15 THE WITNESS: He was interviewed in April.  
16 You just said he was not interviewed in April.

17 BY MR. MACGILL:

18 Q He was interviewed pertaining to this  
19 incident in April of 2022, right?

20 A With specific detail, no.

21 Q Okay. Now --

22 A But he was asked in the scope about --

1     there were five elements, five bullets, and what  
2     we learned on March 31, 2022, would have been one  
3     of those elements, and he could have volunteered  
4     it at the time.

5           Q     Now, so while you are not taking one  
6     step to interview Pastor Johnny Hunt, you've  
7     interviewed the REDACTED how many times?

8           MR. KLEIN:  Objection as to form.  It's  
9     been answered several times this morning and this  
10    afternoon.

11          THE WITNESS:  Attempts were made to  
12    interview Johnny Hunt before April 26th, and there  
13    was difficulty in getting him or acquiring his  
14    availability.  His own schedule prevented an  
15    interview prior to April 26th.  There were several  
16    attempts made to try to schedule him before  
17    April 26th.

18    BY MR. MACGILL:

19          Q     So -- but in any event you and Samantha  
20    Kilpatrick did an in-person interview of Pastor  
21    Johnny Hunt at one point in April on April 26.  
22    2022; is that right?

1           A       That is correct.

2           Q       In Branson, Missouri?

3           A       That is correct.

4           Q       And this is in person as you said?

5           A       That is correct.

6           Q       And you typed up notes pertaining to  
7 that.

8           A       Yes, sir.

9           Q       And since you were there and since  
10 Ms. Kilpatrick were there, tell this court and  
11 jury what you asked about this incident during  
12 that in-person meeting with Johnny Hunt?

13          A       I asked him if he was aware of any  
14 sexual abuse by any members of the executive  
15 committee. I asked him if there were any -- if he  
16 had any knowledge of any mistreatment of sexual  
17 abuse victims by executive committee members from  
18 January 1, 2000, to June 14, 2021. But I did not  
19 get any more specific than that related to what  
20 REDACTED told us on March 31st, 2022.

21          Q       All right. So let's talk about you for  
22 a few minutes now in terms of your conduct. On

1 April 26th, 2022, when you were in person face to  
2 face with Pastor Johnny Hunt, you didn't mention a  
3 word what had been said to you by REDACTED  
4 on February 11, 2022, did you?

5 A That's correct.

6 Q Sir, when you are face to face with  
7 Pastor Johnny Hunt on February 15 -- or I'm  
8 sorry -- when you are on the phone -- let me back  
9 up.

10 When you were in person with Pastor Johnny  
11 Hunt on April 26, you not didn't share with him any  
12 of the specific details of your interviews -- of any  
13 of your six interviews regarding this incident that  
14 we're talking about in this case, did you?

15 A On that date I did not.

16 Q You did not. And not only did you fail  
17 to do so, sir, Samantha Kilpatrick also stood  
18 silent on this topic. She didn't mention a word  
19 about the six interviews that had been conducted  
20 of the REDACTED, individually or together?

21 MR. KLEIN: Objection as to form. You can  
22 answer if you know.



1           THE WITNESS: We did not disclose the fact  
2     that we had interviewed the REDACTED or any other  
3     witness to Dr. Hunt on April 26, 2022.

4     BY MR. MACGILL:

5           Q     So for three and a half months you've  
6     had information pertaining to this but yet when  
7     you have an opportunity to hear "the other side of  
8     the story," you stood silent, did you not, sir?

9           MR. KLEIN: Objection as to form. Asked  
10    and answered now three times. I'd ask you to move  
11    on, but he can answer it one more time.

12           THE WITNESS: I wouldn't characterize it  
13    as stood silent.

14    BY MR. MACGILL:

15           Q     Okay. You talk about other things. But  
16    you certainly didn't talk to Pastor Johnny Hunt  
17    about the specifics as alleged by the REDACTED ,  
18    right?

19           MR. KLEIN: Objection. Asked and  
20    answered.

21           THE WITNESS: Correct.

22

1 BY MR. MACGILL:

2 Q Let's be even more specific. You didn't  
3 hand him, for example, Exhibit 9, did you? This  
4 REDACTE document, you didn't hand him that, did  
5 you?

6 A I did not hand that to him.

7 Q You didn't -- you didn't hand him  
8 Exhibit 7 either, did you?

9 A I did not.

10 Q Okay. You, for your part, said that you  
11 were conducting an independent investigation,  
12 right?

13 A Yes.

14 Q And you were not, according to you,  
15 influenced improperly or with improper motivations  
16 yourself as far as the REDACTED were concerned  
17 according to you, right?

18 A I was not influenced.

19 Q All right. Now, if you're doing an  
20 independent investigation, sir, why is it that you  
21 don't provide the information to somebody like  
22 Pastor Johnny Hunt, when you are with him face to

1 face.

2 A At that point in the investigation we  
3 wanted to speak to Roy Blankenship to provide  
4 additional corroboration before we spoke to  
5 Dr. Hunt.

6 Q Well, you didn't talk to Mr. Blankenship  
7 until May 9th, right?

8 A Correct.

9 Q Now, you are keeping a secret from  
10 Pastor Johnny Hunt the identity of three of your  
11 "corroborating witnesses." Right?

12 MR. KLEIN: Objection as to form and  
13 mischaracterization. You can answer.

14 THE WITNESS: I would not call it keeping  
15 a secret.

16 BY MR. MACGILL:

17 Q Well, you won't tell --

18 A I would call it -- can I finish?

19 Q Yes.

20 A We did not disclose the identities or  
21 the allegations on April 26th.

22 Q He's on the phone. He's listening to

1 this testimony. Why don't you tell him right now  
2 who these three men are, sir?

3 MR. KLEIN: Objection as to form. We've  
4 discussed it. We are not going to identify those  
5 names. They are attorneys eyes only pursuant to a  
6 court order, and we are happy to discuss if and when  
7 your motion is decided.

8 BY MR. MACGILL:

9 Q All right, sir. So let's handle it this  
10 way. So you named three witnesses in your  
11 testimony. Do you recall that line of testimony?

12 A When Mr. Hunt -- Dr. Hunt was not on the  
13 line. Yes. I disclosed to that to you.

14 Q To me, but not to him, right?

15 MR. KLEIN: Objection. We've gone over  
16 this all morning. That's correct.

17 THE WITNESS: I just said that.

18 BY MR. MACGILL:

19 Q All right. So just to orient us as to  
20 what you are doing here?

21 MR. KLEIN: Objection as to the  
22 characterization that he is doing anything. But you

1 can answer the question.

2 BY MR. MACGILL:

3 Q No I'm just referring to the fact that  
4 you refuse to tell Pastor Johnny Hunt the identity  
5 of these witnesses. Nothing more. All right? So  
6 I want to ask you, sir, with respect to these  
7 three witnesses, witness one was referred to you  
8 by REDACTED ; is that right?

9 A Yes.

10 Q Witness two was referred to you by REDACTED  
11 REDACTED ; is that right?

12 A Yes.

13 Q And witness three was referred to you by  
14 REDACTED ; is that right?

15 A Yes.

16 Q And you interviewed one on May 4, 2022;  
17 is that right?

18 A Yes.

19 Q Witness two you interviewed on May 5,  
20 2022. Correct?

21 A Yes.

22 Q And witness three you interviewed on

1 May 5, 2022, also; is that right?

2 A Yes.

3 Q All right. Now, did you think that it  
4 might be a fair approach as a person with 32 years  
5 of investigation experience and someone conducting  
6 this work on behalf of Guidepost to explain on  
7 April 26th to Pastor Johnny Hunt that these  
8 allegations had been made and did he have any  
9 witnesses that would be to describe what had  
10 happened according to him?

11 A We did not confront Dr. Hunt on April 26  
12 with the allegations from REDACTED at that  
13 time. And the second interview he was asked if he  
14 had any witnesses that he thinks we should talk  
15 to.

16 Q Okay. Now, so you spoke to -- Samantha  
17 Kilpatrick spoke to Pastor Johnny Hunt on May 10;  
18 is that right?

19 A That's what it says here in this  
20 document.

21 Q Let's back up to -- let's go to this  
22 exhibit. I want to talk about an email before we

1 go to the next exhibit, sir.

2 (HOLSKE Exhibit Number 13 was marked for  
3 identification.)

4 BY MR. MACGILL:

5 Q Sir, I've handed you Exhibit 13. Would  
6 you please take a look at Exhibit 13?

7 A Yes.

8 Q And if you start on the back there's an  
9 email from you, May 4th, that I want to ask you  
10 about. And then you can look at everything  
11 obviously.

12 A I've read it.

13 Q The first email is from you to Christina  
14 Bischoff. Do you see that?

15 A I do see it.

16 Q What was her job?

17 A She was the drafter, the writer of --  
18 her role was not investigative in any way. It was  
19 to write the report.

20 Q And did she respond to your email on  
21 May 4th at 10:14 saying: Thanks -- she responding  
22 to you -- What do you think about language like

1 this. Re alleged Hunt assault?

2 Do you see that?

3 A I see what she wrote.

4 Q And it says what she's proposing: "In  
5 the course of our investigation and the  
6 interviewee who did not want to be named, provided  
7 [credible]? information that a former member of  
8 SBC leadership had committed a sexual assault  
9 because we were unable to obtain additional  
10 corroboration during the investigation period, we  
11 do not report the allegation in this report."

12 Do you see that?

13 A I do see it.

14 Q And she's referring to Pastor Johnny  
15 Hunt, is she not?

16 A Yes. And she says the interviewee who  
17 did not want to be named, who is that, sir?

18 MR. KLEIN: If it's one of the names that  
19 had been identified publicly, you can give that  
20 name. If it's not anyone who's yet been identified  
21 publicly, then you cannot.

22 THE WITNESS: I don't know who she is



1 referring to in this email, so I'm hesitant to  
2 potentially name one of the three witnesses that we  
3 agreed we wouldn't name.

4 BY MR. MACGILL:

5 Q But do you agree with the statement she  
6 made as of that time, May 4 of 2022 at 10:14 that  
7 we were unable to obtain -- because we were unable  
8 to obtain additional and corroboration during the  
9 investigation period, we do not report the  
10 allegation in this report. Do you agree with that  
11 statement, sir?

12 A At this point Ms. Bischoff is creating  
13 the shell of what will become the final report. I  
14 think by this date on the 4th I had spoken to  
15 witness one, but had not spoken to witness two and  
16 three. And you may have misspoken and I may have  
17 mis-answered when you said April 4 potentially or  
18 5th. I'm not exactly sure.

19 Let me look at the dates -- can I refer to  
20 the list of interviews so I can make sure I get the  
21 dates correct.

22 Q Sure.

1           A       So in fact witness one to corroborate  
2       the allegation was the day of this email, and I  
3       had not yet spoken to witness two and three.   So  
4       in her attempting to draft the shell of the  
5       document, this is a language that she proposed to  
6       me that I said could work based on what we knew at  
7       that point.

8           Q       So --

9           A       And I am referring, based on the date  
10      and time, if you look at my email, Wednesday  
11      May 4th, at 10:19 p.m., I am referring to witness  
12      one in paragraph 2.

13          Q       And you are saying I did get a pastor to  
14      corroborate the relating of the incident in the  
15      month or two after it occurred.   That's witness  
16      one according to you?

17          A       Yes, sir.

18          Q       And specifically, the victim's husband  
19      told another pastor what happened, right?

20          A       Yes.   And that would be witness two, who  
21      I had not spoken to at the time of this email.

22          Q       And again, this just is confirming again

1 that this is secondhand information provided by

2 REDACTED to two other pastors?

3 A This is relating that fact.

4 Q Okay. And you weren't representing that  
5 they had firsthand knowledge. You were saying  
6 that, you know, this is -- you know, for example,  
7 the victim's husband told another pastor what  
8 happened. That's one example of what you said,  
9 right?

10 A I'm identifying it as corroboration.

11 Q Okay. Now, then she says: Let's see  
12 what happens tomorrow, adding in -- this is her on  
13 May 5 at 2:22 a.m. -- let's see what happens  
14 tomorrow, adding in the info about pastor, even  
15 without naming Hunt would lend credence to the  
16 allegation. Right?

17 A That's what she wrote.

18 Q And then you had an interview later that  
19 day with witness number three, right? May 5,  
20 2022?

21 A Let me look.

22 Q Or Samantha Kilpatrick did I could say.

1           A     No.   We -- we interviewed witness two,  
2     and we interviewed witness three on that date.   So  
3     one possibly happened before -- oh, this is  
4     2:22 a.m.   I'm sorry I thought it was p.m.   So we  
5     had not yet interviewed witness two and three on  
6     the 5th.

7           Q     Okay.   And you didn't -- she -- you both  
8     interviewed witness two, and she interviewed  
9     witness three; is that right?

10          A     No.   That's not right.

11          Q     Did you interview REDACTED -- did you  
12     interview that third witness?

13          A     Samantha Kilpatrick and I conducted the  
14     interview together of witness two and witness  
15     three.

16          Q     Okay.   I see it on the second page.

17          A     On May 5th.

18          Q     Okay.   Now, all of this is happening  
19     only -- how many days prior to the publication of  
20     the report?

21          A     Are you referring to the last email here  
22     on the chain?

1 Q Yeah.

2 A So this would be the 22nd. So 17 days.

3 Q Okay. So you are at the end of the  
4 line. And 18 days before the report is published  
5 it says: Because we are unable to obtain the  
6 additional cooperation during the investigation  
7 period, we do not report the allegation in this  
8 report.

9 So --

10 A Which line are you referring to?

11 Q May 4.

12 A Oh, from Christine.

13 Q So she's saying 18 days before the  
14 report -- what she's saying -- her proposed  
15 language is, as simply put, we do not report the  
16 allegation in this report. Right?

17 A That's what she wrote there.

18 Q And then the -- the -- what changed is  
19 you claimed that there was corroboration by the  
20 repeating of what REDACTED said to three  
21 people?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: No. I wrote here that I got  
3 corroboration from witness one. That's what I state  
4 in this --

5 BY MR. MACGILL:

6 Q All you got --

7 A -- response.

8 Q Sir, all you got after May 4 was  
9 "corroboration by three people who said what REDACT  
10 REDACTED told them." Right?

11 A No. What I say here is that I spoke to  
12 witness one from whom I acquired corroboration of  
13 the incident in the month or two after it  
14 occurred.

15 Q I didn't ask you what it says. I just  
16 want you to admit the reality here. All you got  
17 after these words were written by Christina  
18 Bischoff was interviews of three people, witness  
19 one, two, and three, who reported what REDACT  
20 REDACTED had said to them at three different points  
21 in time, right?

22 MR. KLEIN: Objection as to form. Asked

1 and answered.

2 THE WITNESS: That's not accurate. I got  
3 more than the three witnesses. I spoke to Dr. Hunt  
4 on two occasions, and I also interviewed Roy  
5 Blankenship. And I also obtained the hard drive  
6 which contained the journal and the audio, which  
7 forensic analysis confirmed happened between 2009  
8 and 2011. So what you said is not accurate.

9 BY MR. MACGILL:

10 Q So let's talk about being accurate. Did  
11 you report -- did you report REDACTED  
12 comments correctly in the Guidepost report, or did  
13 you edit the statements made by REDACTED to  
14 you that you just described on this record?

15 MR. KLEIN: Objection as to form. You can  
16 answer.

17 THE WITNESS: Could you repeat it one more  
18 time?

19 BY MR. MACGILL:

20 Q So you took REDACTED report to you  
21 in writing, and you edited those words in the  
22 Guidepost report, didn't you, sir?

1 MR. KLEIN: Objection as to form. You can  
2 answer.

3 THE WITNESS: No. That's not accurate.

4 BY MR. MACGILL:

5 Q You're denying -- let's make sure you  
6 know what you are denying. You're denying that  
7 Guidepost edited the information provided by the  
8 REDACTED pertaining to the incident at issue in  
9 this case.

10 MR. KLEIN: Objection as to form. He's  
11 testifying in his individual capacity. To that  
12 extent you can answer the question.

13 THE WITNESS: No. What I'm saying -- what  
14 I will say is that specific references to the abuse  
15 by Dr. Hunt on July 25th, 2010, that we, and not  
16 REDACTED, drafted was provided to the REDACTED  
17 to ensure that we had accurately captured what she  
18 described to us on March 31 and what happened on  
19 July 25th, 2010. He -- they made comments on that,  
20 that we did not necessarily adopt.

21 BY MR. MACGILL:

22 Q You had a witness -- you had two



1 witnesses to your investigation edit your report?

2 MR. KLEIN: Objection as to form.

3 Mischaracterizes his testimony.

4 THE WITNESS: We had a survivor of sexual  
5 abuse ensure that we accurately described what  
6 happened to her on July 25th, 2010.

7 BY MR. MACGILL:

8 Q Did you have REDACTED edit your  
9 Guidepost report prior to the time it was  
10 published on May 22nd, 2022?

11 MR. KLEIN: Objection as to form. Asked  
12 and answered.

13 THE WITNESS: She did not edit the report.  
14 She reviewed the draft and made comments as to the  
15 content in order that we could provide an accurate  
16 description of what happened.

17 BY MR. MACGILL:

18 Q So based on that, you as an independent  
19 investigator, wanting to be fair to the facts and  
20 the realties of what occurred, you also gave the  
21 report to Johnny Hunt for his review, didn't you,  
22 sir?

1           A       No.

2           Q       Sir, you gave it to one witness. Why  
3 did you -- why in the world did you not provide  
4 the same opportunity to Pastor Johnny Hunt, sir?

5           A       We provided it to the survivor of sexual  
6 abuse to make sure that the intimate, painful  
7 details of what happened to her were accurately  
8 described. We did not provide it to witness one,  
9 two, or three. We did not provide it to Roy  
10 Blankenship.

11          Q       So it is one sided from your standpoint.  
12 You are going to take one side of the story and  
13 allow one person or one person and her husband be  
14 an editor of your report. But when it comes to  
15 the other side of the story, not one word is  
16 reviewed or edited, right?

17               MR. KLEIN: Objection as to form.  
18 Mischaracterizes his testimony. You can answer.

19               THE WITNESS: That is not accurate. We  
20 interviewed Dr. Hunt, and his description of the  
21 event on July 25th, 2010, is in our final draft  
22 report that was published.

1 BY MR. MACGILL:

2 Q So you forced Parter Johnny Hunt to  
3 respond to you on -- very promptly and in short  
4 order, didn't you, sir?

5 MR. KLEIN: Objection as to form. You can  
6 answer.

7 THE WITNESS: That's not accurate.

8 BY MR. MACGILL:

9 Q After the interview you gave -- tell the  
10 jury here, sir, and the court how long you gave  
11 Johnny Hunt to contact Guidepost if he remembered  
12 any more details regarding the encounter with  
13 REDACTED ?

14 A He was given no time ultimatums.

15 Q You didn't limit his time for a response  
16 to 24 to 48 hours?

17 A After he spoke to us the second time on  
18 May 12, at the end of the interview after I had  
19 asked him if he had any other witnesses that he  
20 thinks we should talk to and he said the REDACTED  
21 and Roy Blankenship only and not his wife and  
22 didn't provide any other names, I asked him if he

1 had any other information to share, and he  
2 declined, I told him, notwithstanding that, he  
3 still had at least 48 hours to provide more  
4 information upon further reflection, and we did  
5 not hear back from him.

6 Q So you gave him 24 to 48 hours did you  
7 say or just 48 -- I can't remember what his  
8 limitation was. What was the limitation that you  
9 put on his response?

10 MR. KLEIN: Objection as to form. You can  
11 answer.

12 THE WITNESS: I don't recall.

13 BY MR. MACGILL:

14 Q Was it 24 hours, sir?

15 A I don't believe so.

16 Q Was it 48 hours?

17 A I don't recall.

18 Q Now, you didn't put any limitations on  
19 the REDACTED, did you, sir?

20 A They had the same window of time after  
21 May 12th to provide us with additional  
22 information. So if they had additional

1 information between May 12 and when our report was  
2 due to the SBC on May 15th, they would have had  
3 that same time limitation.

4 Q On May 10th you had yet -- Samantha  
5 Kilpatrick had yet another interview on -- I'm  
6 sorry.

7 On May 12, 2022, you conducted another  
8 interview -- strike that. I to the date wrong. Let  
9 me start over.

10 So on May 10, 2022, you had yet another  
11 interview with the -- with REDACTED , right?

12 A I did not.

13 Q Who did?

14 A Samantha Kilpatrick.

15 Q So that was interview number seven?

16 A I don't know the exact number.

17 Q Did you have an eighth interview of the  
18 REDACTED on the 13th of May, 2022, nine days before  
19 the published report?

20 MR. KLEIN: Objection as to form.  
21 Mischaracterizes. You can answer.  
22

1 BY MR. MACGILL:

2 Q Did you have another interview of REDACT  
3 and REDACTED on May 13, 2022?

4 A Yes.

5 Q And that was interview number eight?

6 MR. KLEIN: Objection as to form. You can  
7 answer.

8 THE WITNESS: I don't know what number it  
9 was.

10 BY MR. MACGILL:

11 Q Did you have a ninth interview with  
12 REDACTED on May 19, 2022?

13 MR. KLEIN: Objection as to form.  
14 Mischaracterizes his testimony. He can answer.

15 THE WITNESS: I did not.

16 BY MR. MACGILL:

17 Q Did Samantha Kilpatrick?

18 A Yes.

19 MR. KLEIN: Same objection. You can  
20 answer.

21 BY MR. MACGILL:

22 Q Sir, did you write a text message to the

1 CEO of your company and Krista Tongring on May 9th  
2 pertaining to this report?

3 A I don't know.

4 (HOLSKE Exhibit Number 14 was marked for  
5 identification.)

6 BY MR. MACGILL:

7 Q I'm going to hand you Exhibit 14. Is  
8 this a screen shot of one of your texts?

9 A Can I read it for a moment, please.

10 Q Yes.

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14 Q And why are you writing the CEO about  
15 the fact that you've arrived in REDACTED ,  
16 REDACTED

18 A As I explained earlier, myself and  
19 Samantha communicated upward to the program  
20 manager, for lack of better term, and the CEO in  
21 these matters.

22 Q Now sir, this is -- tell the jury what

1 the date is of this text?

2 MR. KLEIN: Objection. Asked and answered  
3 you can answer.

4 REDACTED

5 BY MR. MACGILL:

6 Q All right. And this is prior to the  
7 time that you had -- you and Ms. Kilpatrick  
8 interviewed Pastor Johnny Hunt on May 12th?

9 A May 9th is prior to May 12th, yes.

10 Q And you'll admit that you did interview  
11 Johnny Hunt on May 12th, 2022.

12 A I and Samantha Kilpatrick interviewed  
13 Dr. Hunt on May 12th, 2022.

14 Q So to put crystal clarity on this, three  
15 days before you interviewed Pastor Johnny Hunt,  
16 you wrote to the CEO of your company: REDACTED

21 That's what you wrote three days, sir,  
22 before you interviewed Pastor Johnny Hunt; is that



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11 THE WITNESS: As I said earlier, he was  
12 interviewed on April 26th but not confronted with  
13 the specific point-by-point allegations of abuse on  
14 REDACTED

15 BY MR. MACGILL:

16 Q So you had never -- to repeat -- you had  
17 never talked to Pastor Johnny Hunt before May 12,  
18 2022, about the incident involving REDACTED ,  
19 right?

20 MR. KLEIN: Objection as to form. Asked  
21 and answered. I ask you to move on. Please answer  
22 one more time.

1           THE WITNESS: As I just mentioned, I did  
2 not get into the detailed specific allegations on  
3 April 26th, 2020.

4 BY MR. MACGILL:

5           Q     You didn't get in -- sir, you didn't get  
6 into a single issue associated with the REDACT  
7 REDACTED encounter at the time that you interviewed  
8 Pastor Johnny Hunt on April 26th, 2022, right?

9           MR. KLEIN: Objection. Asked and answered  
10 again.

11           THE WITNESS: We did not discuss anything  
12 that happened on July 25th, 2010, in our interview  
13 with Dr. Hunt on April 26, 2022.

14 BY MR. MACGILL:

15           Q     So on May 12, the first time that you  
16 talked to Pastor Johnny Hunt about this matter,  
17 three days prior to that interview you wrote this  
18 text to the CEO of your company, right?

19           A     I did.

20           Q                   REDACTED

1

REDACTED

1           MR. KLEIN: Objection. Mischaracterizes  
2 the document. The document speaks for itself, but  
3 you can answer.

4           THE WITNESS: That's not accurate.

5 BY MR. MACGILL:

6           Q     Okay. So let's go through the words and  
7 the timing one more time because you just said to  
8 this court it's not accurate. Let's take it very  
9 slowly.

10          A     It's not accurate in the way you  
11 characterize it.

12          Q     Fine. Let's take it so literally there  
13 will be no confusion between you and me in any  
14 way. The exact words that you wrote on May 9,  
15 2022, to the CEO of your company and the project  
16 manager are the following:

17   REDACTED

1     that correct.

2           A     In here I am referring to the detailed  
3     specific description by     REDACTED     of what  
4     occurred on July 25th, 2010.

5           Q     Did I read your text correctly, sir,  
6     just a minute ago?

7           A     The REDACTE did not review anything  
8     other than the specifics, as I mentioned earlier,  
9     of what     REDACTED     told us happened on  
10    July 25th, 2010.

11          Q     Okay. Let's try this one more time.  
12    Did you or did you not write the following words  
13    to the CEO of your company and your project  
14    manager?

15               MR. KLEIN: I will stipulate to it that  
16    you read it accurately if that will help you, Rob.  
17    Just so we can move past that. I'll stipulate that,  
18    as you wrote -- as you say it, that's what the words  
19    on the document say.

20    BY MR. MACGILL:

21          Q     And you agree with that? I want to make  
22    sure that your counsel -- you agree with you

1 REDACTED

4 BY MR. MACGILL:

5 Q Okay. Thank you. Now, and you've  
6 admitted I think, but let's just make sure because  
7 of the answers two times ago. This May 9th was  
8 three days before you'd ever interviewed Pastor  
9 Johnny Hunt about the incident involving REDACT

10 REDACTED Right?

11 MR. KLEIN: Objection. Asked and  
12 answered. You can answer.

13 THE WITNESS: On May 9th we had not yet  
14 confronted Dr. Hunt with the specific sexual abuse  
15 allegation by REDACTED

16 BY MR. MACGILL:

17 Q And you not -- in fact, it's worse than  
18 that, sir. It's much worse than that. You hadn't  
19 whispered a word or stated a word to Pastor Johnny  
20 Hunt about REDACTED claims about this  
21 incident at the time of April 26, 2022. Right?

22 MR. KLEIN: Objection. I'm directing the

1 witness not to the answer. We've gone over this for  
2 20 minutes now. I ask you please, Mr. MacGill, to  
3 move on. I think you've established whatever you  
4 need to establish. I'm directing the witness not to  
5 answer.

6 BY MR. MACGILL:

7 Q REDACTED

20 MR. KLEIN: Objection. Asked and  
21 answered.

22 THE WITNESS: As I explained before,



1 including intimate, personal, sexual abuse details  
2 in a report that will be publicized, we want to  
3 ensure that the survivor of that sexual abuse is  
4 convinced that how we described what happened to her  
5 was 100 percent accurate.

6 BY MR. MACGILL:

7 Q Well, sir. Weren't you concerned at a  
8 the basic level of humanity, forget your  
9 investigator role -- but as a human being, weren't  
10 you concerned, sir, that Mr. Blankenship had  
11 stated that he thought the encounter between REDACTE  
12 REDACTE and Pastor Johnny was consensual?

13 A I wasn't concerned because he told me  
14 that he felt he wasn't given the entire accurate  
15 story by Dr. Hunt.

16 Q Oh, and this is what happened when you  
17 stood to the sidewalk and waited for him to come  
18 outside his office?

19 A No. This is what happened when he  
20 invited us into his office to have a discussion.

21 Q He invited you in after you were waiting  
22 on the sidewalk for him to leave his office that

1 day?

2 A Those did happen in that order of  
3 events, yes. We were on the sidewalk, and then we  
4 were inside the building.

5 Q REDACTED

8 Q And that's Woodstock, Georgia, right?

9 A Kennesaw is actually the location of the  
10 office.

11 Q Okay. So you miswrote -- you wrote this  
12 incorrectly?

13 A I haven't been to Georgia too many  
14 times.

15 Q Okay. And you are sitting out in front  
16 of Roy Blankenship's office there in Woodstock or  
17 Kennesaw as the case may be, and his car -- you  
18 identified his car. How did you know it was his  
19 car?

20 A Investigation.

21 Q So you did some investigation to find  
22 out what kind of car he drove before you flew over

1 to Georgia; is that right?

2 A Yes.

3 Q And then you made a plan, and that is  
4 when he would come out, you would approach him and  
5 try to get him to talk to you, right?

6 A Yes.

7 Q And you were hopeful that might happen?

8 A Of course. I wanted him to speak to us.

9 Q Right. You put an emoji in there of  
10 crossed fingers, right? Is that correct?

11 A That's correct.

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Q And just continuing, sir, the final report says the following, and I'm quoting at page 155 of the report. You say as to Mr. Blankenship: He reported very similar details and events to those reported by survivor and pastor.

Do you remember writing those words?

A Can you point me to the specific entry that you are referring to, please?

Q Page 155.

A Right. And where? Which paragraph?

Q Do you recall those words, sir. Do you need to see them? Do you recall those words, sir?

A I'd like to read what you just stated.

Q Just generally, do you recall those words?

A What words?

Q Do you recall writing the words as far as Mr. Blankenship is concerned: He reported very similar details and events to those reported by survivor and pastor.

1 Do you recall those words, sir?

2 A I don't see those words in this  
3 document.

4 Q Well, we'll get there. Do you recall,  
5 just separate from the -- do you have any  
6 recollection of writing those exact words in the  
7 report?

8 A No.

9 Q Now, if you look at page 155 -- are you  
10 on page 155?

11 A Yes, I am.

12 Q You said in the last paragraph: Our  
13 investigators found Mr. Blankenship to be  
14 credible.

15 Your words?

16 A I didn't write this last paragraph.  
17 This is not my words.

18 Q Is that correct?

19 A I have no problem with the accuracy of  
20 what's stated here.

21 Q And then continuing, the Guidepost says:  
22 As stated above, he did not seek to participate

1 in the investigation and only reluctantly agreed  
2 to speak with investigators.

3 A I'm comfortable with that statement.

4 Q True to the best of your knowledge?

5 MR. KLEIN: Objection as to form. Asked  
6 and answered.

7 THE WITNESS: I'm comfortable with what's  
8 written there.

9 BY MR. MACGILL:

10 Q Okay. So then the report continues: He  
11 reported very similar details and events to those  
12 reported by survivor and pastor.

13 Is that true as far as Mr. Blankenship is  
14 concerned?

15 A Comma, with the only significant  
16 difference being on the issue of consent.

17 Q Okay. Well --

18 A That's an accurate statement. That last  
19 sentence in its entirety is accurate.

20 Q So the entire sentence is correct?

21 A I think to only include the first phrase  
22 changes the meaning of the sentence.

1           Q     I didn't mean to. I just want to get  
2 clear admissions from you here, sir. Maybe we can  
3 be do it in a more expansive way. Okay?

4                     Do you agree in all respects with the  
5 following statement in the Guidepost report: He  
6 reported -- meaning Mr. Blankenship -- very similar  
7 details and events to those reported by survivor and  
8 pastor with the only significant difference being on  
9 the issue of consent.

10                    Do you agree in all respects with that  
11 portion of the Guidepost report?

12           A     That is an accurate statement.

13           Q     And is it accurate in terms of how  
14 you -- what you learned in your interview with  
15 Mr. Blankenship?

16           A     Could you be more specific?

17           Q     When of interviewed Mr. Blankenship on  
18 May 9, 2022, is this part of what he confirmed to  
19 you on that day, what we just read?

20           A     Being as specific as I can to that last  
21 sentence, Roy Blankenship said that he believed  
22 that the encounter was consensual based solely

1 upon what Dr. Hunt told him.

2 Q Okay. Now, but again, what you said in  
3 the report, those aren't the words of your report.  
4 You said with the only significant difference  
5 between on the issue of consent. Those are the  
6 exact words in the Guidepost report, right?

7 MR. KLEIN: Objection. That those are his  
8 words? But he can answer.

9 THE WITNESS: They are not my words, but  
10 I'm comfortable with the accuracy of that sentence.

11 BY MR. MACGILL:

12 Q You are comfortable in every respect  
13 with that last sentence, are you not?

14 MR. KLEIN: Objection as to form. Asked  
15 and answered.

16 THE WITNESS: I'm comfortable with it.

17 BY MR. MACGILL:

18 Q Okay. Is there any portion of this  
19 sentence that you are not comfortable with based  
20 on your interview with Mr. Blankenship?

21 MR. KLEIN: Objection. Same question.  
22 You can answer one more time.



1 THE WITNESS: I am comfortable with it.

2 BY MR. MACGILL:

3 Q Okay. Thank you. So in terms of what  
4 your -- what the report says, the report indicates  
5 that there's a significant difference from  
6 Mr. Blankenship between the quote survivor and the  
7 pastor on the issue of consent, right?

8 A I don't really understand your question.

9 Q Okay. Fair enough.

10 A If you could repeat it, please.

11 Q Sir, did you write to your CEO before  
12 you met with Mr. Blankenship saying that you  
13 basically have, at that point, the story to date  
14 before you add whatever we do -- whatever we get  
15 or don't get from Mr. Blankenship.

16 A I don't see that here in this document.

17 Q It's not in that document. Did you  
18 write that?

19 A I don't recall.

20 Q Let's look at another exhibit.

21 (HOLSKE Exhibit Number 15 was marked for  
22 identification.)

1 BY MR. MACGILL:

2 Q I'll hand you Exhibit 15, sir.

3 Sir, take a look at Exhibit 15 if you  
4 would.

5 A Yes.

6 Q Is this an email, sir, that you wrote to  
7 the CEO of your company and others?

8 A Yes, it is.

9 Q Including Samantha Kilpatrick?

10 A Yes.

11 Q And the subject line was proposed  
12 language for Hunt; is that right?

13 A Yes.

14 Q And you're talking about, and what you  
15 attach here is proposed language for Hunt. Do you  
16 see? Do you see that?

17 A I see it.

18 Q And you're 13 days before you publish  
19 the report -- before Guidepost published the  
20 report, you are reporting on your approach to  
21 Mr. Blankenship; is that right?

22 A I state in here that -- that Samantha

1 and I will approach Roy Blankenship.

2 (HOLSKE Exhibit Number 16 was marked for  
3 identification.)

4 BY MR. MACGILL:

5 Q Let's go to the next exhibit, sir.

6 We'll do this then take a break.

7 Sir, just as an overview question and then  
8 take a look at it, is this the proposed language  
9 that you had drafted for the REDACTED "?

10 MR. KLEIN: Objection. At what point in  
11 time? Are you asking him for a particular point in  
12 time or just in general?

13 BY MR. MACGILL:

14 Q Looking at Exhibit 15, sir. Is this the  
15 attachment to Exhibit 15?

16 A I don't know.

17 Q Don't know?

18 A I don't know.

19 Q All right. Is Exhibit 16 something that  
20 you authored?

21 A I need a couple moments to review it.

22 Q That's fine.

1           A       Because Samantha Kilpatrick and I had a  
2       very similar experience.

3                   (HOLSKE Exhibit Number 17 was marked for  
4       identification.)

5       BY MR. MACGILL:

6           Q       Sir, I'm going to hand you Exhibit 17.

7           A       So you don't want me to look at this  
8       then?

9           Q       I do. But I want you to have Exhibit 17  
10      in your hand because it may help you.

11                  MR. KLEIN: One moment, Rob, do you want  
12      us to look at Exhibit 16.

13      BY MR. MACGILL:

14           Q       Look at 16 and 17 together. Put them  
15      next to one another, if you would. You see  
16      there's a Bates number convention here. It shows  
17      want GP\_012444. Do you see that?

18           A       I do.

19           Q       And on 17, do you see the same Bates  
20      number?

21           A       I do.

22           Q       And I'll represent to you that this is

1 part of the metadata and it shows a creation date  
2 of REDACTED Do you  
3 see that?

4 A I see that.

5 Q Okay. So relative to that, does this  
6 let you understand that -- when Exhibit 16 was  
7 created?

8 MR. KLEIN: Objection as to form. The  
9 document speaks for itself.

10 THE WITNESS: It indicates when it was  
11 started. So started -- created -- started on the  
12 REDACTED It doesn't identify when it ends up  
13 being -- four pages long?

14 BY MR. MACGILL:

15 Q Yes.

16 A And shared.

17 Q Now, is this one of the first versions  
18 of the portion of the report relating to  
19 allegations against Pastor Johnny Hunt?

20 A It's a draft.

21 Q And one of the first drafts you made?

22 A I don't know that I can characterize as

1 one of the first drafts. It's a draft.

2 Q REDACTED

12 MR. KLEIN: I think he's trying to finish  
13 reading the entire document to give you an accurate  
14 answer.

15 BY MR. MACGILL:

16 Q Okay. Why don't we go ahead and take a  
17 break. He can look at it and see if he has  
18 anything else -- we'll start with that question  
19 when we come back. We've been going an hour and a  
20 half. Maybe about 15 or 20 minutes.

21 VIDEOGRAPHER: We are off the record  
22 14:58.

1 (Whereupon, a brief recess was taken.)

2 VIDEOGRAPHER: Back on the record at

3 15:24.

4 REDACTED

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Q Page 5 of the final report says

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survivors, those persons who actually suffered at

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the hands of SBC clergy or SBC church staff or

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volunteers, that's what your final report says in

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pertinent part, right?

7

A I haven't read that section. If you

8

want to call my attention to it, I can look at it.

9

Q No, I -- we'll move ahead.

10

I'm going to happened you exhibit 18.

11

(HOLSKE Exhibit Number 18 was marked for

12

identification.)

13

BY MR. MACGILL:

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1 ~~REDA~~

2 Q Okay. So looking at this, sir, have you  
3 heard in journalism the reference to an ambush  
4 interview?

5 A No.

6 Q No, you've not -- do you ever watch 60  
7 Minutes for example?

8 A I've seen 60 minutes before.

9 Q Yeah. You've seen some of these where  
10 it's referred to commonly as ambush interviews  
11 where the 60 Minutes reporter would essentially  
12 "ambush" somebody about a topic and then put  
13 microphone in front of him. Are you familiar with  
14 that phenomenon?

15 A I can't say that I am.

16 Q Okay. Well, you're familiar with doing  
17 an ambush interview because that's what you did on  
18 May 12th, isn't it?

19 MR. KLEIN: Objection as to form.

20 THE WITNESS: No.

21 BY MR. MACGILL:

22 Q That's what you did on May 12th, 2022.

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Are those your notes or Ms. Kilpatrick's?

A I believe the dark blue on the right  
corresponds to the sender.

Q When you say the dark blue on the right,  
what are you referring to.

A The darker shaded bubbles?

Q So the bubbles, you think that this  
Samantha Kilpatrick?

A Yes.

Q So with you-all having the job of  
providing an independent report, why are you  
worried about REDACT?

A Accuracy.

Q Well, sir, she didn't say accuracy. The  
word here is REDACT. Of what concern of yours, if  
any, was there to having REDACT to your report?

1           A       That the substance of what happened to  
2 her is accurately portrayed. I didn't write that  
3 sentence, so I can't really answer what REDACT  
4 means in this sense, but that's, I believe, how I  
5 took it.

6           Q       Then the words -- are you saying these  
7 REDACTED

10                   Is that your word? Yes?

11           A       I believe so.

12           Q       Why would a description of demeanor be  
13 important for purposes of an independent  
14 investigation by your company?

15           A       I think it speaks to the atmosphere of  
16 the interview, and we did likewise refer to  
17 demeanor for Mr. Blankenship. So I don't remember  
18 exactly.

19           Q       Now, are you referring to his demeanor  
20 on May 12?

21           A       This text appears as though it took  
22 place after we spoke to Dr. Hunt on the 12th. So

1           A       That's not accurate. We interviewed --

2           Q       Let me finish my question. You did an  
3 interview where you ambushed Pastor Johnny Hunt  
4 without him giving him any notice of months of  
5 communications you'd had with each of the REDACTED ,  
6 right?

7                   MR. KLEIN: Objection as to form.  
8 Mischaracterizes the testimony, but you can answer.

9                   THE WITNESS: No. We gave Dr. Hunt an  
10 opportunity to be confronted with the facts that at  
11 that point we were confident in confronting him with  
12 after talking to Roy Blankenship and presenting him  
13 with the facts, and he denied them.

14 BY MR. MACGILL:

15           Q       Did you tell him that Mr. Blankenship  
16 continued to believe that there was -- this was a  
17 consensual event? Did you tell him that when you  
18 interviewed him on May 12th.

19           A       I would need to refer to that interview  
20 report to be able to answer your question.

21 BY MR. MACGILL:

22           Q       How about this? Did you give him the

1 tape recording of the Mr. Blank- -- of the  
2 counseling session that you had possession of?  
3 Did you play that for him?

4 A No. I wouldn't have played that for  
5 him.

6 Q Let's talk about you some more, sir.  
7 Did you take some steps to tell him that you had  
8 no sexual abuse of any executive committee member  
9 prior to February of 2022? Did you tell him that?

10 A I wouldn't have been able to. I wasn't  
11 aware of what the other strings of the  
12 investigation, where they were at at that point.  
13 I can only speak to what my own experiences were.  
14 But I did not bring up that first bullet in the  
15 scope of our investigation.

16 Q Did you tell him that you had already  
17 been drafting the section of the report pertaining  
18 to him as of May 12?

19 A No.

20 Q Did you tell him that specifically that  
21 you were going to -- you were going to send  
22 interview information that he gave to you to the

1     REDACTED for feedback? Did you tell him that, sir?

2             A     No.

3             Q     Okay. How about -- on May 12 did you  
4     share with Pastor Johnny Hunt that on May 4th,  
5     Christina Bischoff, one of the authors of the  
6     report, had indicated that we don't report the  
7     allegation in the -- the Hunt allegation in this  
8     report. Did you tell Pastor Johnny Hunt that?

9             MR. KLEIN: Objection as to form.  
10    Mischaracterizes the testimony, but you can answer.  
11    BY MR. MACGILL:

12            Q     Did tell him that?

13            A     Did I tell him that I was emailing with  
14    the writer of the draft on May 4th before I'd  
15    spoken to witness two, witness three, Roy  
16    Blankenship? No, I didn't tell him that.

17            Q     No, no. I didn't ask you that. You  
18    know -- well, let's make sure we get you --

19            A     I'm trying to understand your question.

20            Q     Yes, sir. Let me start with a new one  
21    and maybe it's easier for you to answer. Exhibit  
22    11, did you share with him Exhibit 11, sir.

1           A     As I stated earlier, I only saw this  
2 document today for the very first time. So I  
3 wouldn't have been able to share that with him.

4           Q     Wouldn't it have been fair -- if you  
5 were going to be independent in this, wouldn't it  
6 have been appropriate for you to say that as of  
7 April of 2022 that your company, as far as  
8 allegations of abuse committed by executive  
9 committee members, had a document in his files  
10 saying this is from messenger's motion:  
11 Investigation so far has not revealed any  
12 allegations of abuse committed directly by EC.

13                     Wouldn't it have been fair to show that to  
14 Johnny Hunt --

15           MR. KLEIN:   Objection.

16           MR. MACGILL:   -- on May 12th.

17           MR. KLEIN:   Objection as to form. You can  
18 answer.

19           THE WITNESS:   I was unaware of the  
20 existence of that particular draft. I had no  
21 involvement of it. I had never seen it, so I  
22 wouldn't have been able to share it.

1 BY MR. MACGILL:

2 Q Looking back at this text string that  
3 we've been -- that you have in front of you with  
4 Ms. Kilpatrick, sir, we have the metadata in  
5 front, and it shows that you are the custodian of  
6 this text and specifically that the comment -- the  
7 dark shade, these are your comments, sir. That's  
8 what the metadata show. I'm represent that to be  
9 the case.

10 Sir, the evidence in this case will be --  
11 let me start with the first question. The evidence  
12 in this case will be that you wrote a text to your  
13 REDACTED

16 Sir, the evidence in this case will be  
17 that that is -- those are your words.

18 A Okay.

19 Q What did you mean by REDACT, sir?

20 A I really can't answer that question  
21 because I'm not clear on what -- where the draft  
22 was at that point, what I was looking at to cause



1 engagement letter. I saw it for the first time  
2 today.

3 BY MR. MACGILL:

4 Q And you never -- you never understood  
5 that part of your charge as an investigator was to  
6 have a report that had REDACTED

7 MR. KLEIN: Objection.

8 BY MR. MACGILL:

9 Q Right?

10 MR. KLEIN: Asked and answered.

11 THE WITNESS: REDACT referring to accuracy  
12 of the survivor's statement of what occurred on the  
13 July 25th, 2010.

14 BY MR. MACGILL:

15 Q Well, if that's what you meant, why  
16 didn't you say accuracy?

17 A Because if the draft -- and I don't have  
18 what I'm referring when I made this text message  
19 to Samantha -- if it lacked detail, then it is not  
20 fully accurate.

21 Q Now, did you -- did REDACTED write you  
22 about the type of language that he wanted in your

1 me to make that statement.

2 Q But sir, I noticed -- I've looked at the  
3 engagement letter carefully. I don't see anywhere  
4 where it's written that you are to write a report  
5 that has REDACTED

6 Am I missing something in the engagement  
7 here, sir.

8 A As I said earlier, when I incorrectly  
9 attributed it to Samantha Kilpatrick, in this way  
10 REDACT would have referred to an accurate  
11 description of what the survivor, REDACT ,  
12 had undergone on July 25th, 2010.

13 Q I'm looking, sir, I have it right in  
14 front of me. I'm looking at the engagement letter  
15 itself, Exhibit 2. I've read it. Here, again, I  
16 don't see any references here, sir, to REDACT  
17 anywhere in that document.

18 Do you know of some part of your template  
19 that you are to investigate and evaluate REDACT.

20 MR. KLEIN: Objection. Asked and  
21 answered. You can answer one more time.

22 THE WITNESS: I haven't read the entire

1 REDACTED

4 (HOLSKE Exhibit Number 19 was marked for  
5 identification.)

6 BY MR. MACGILL:

7 Q Well, there was -- let's look at text

8 REDACTED .

9 Will you look at -- what exhibit is this?

10 MR. KLEIN: 19.

11 BY MR. MACGILL:

12 Q Thank you -- Exhibit 19, sir, have you  
13 seen this text string before?

14 A Okay. I've reviewed it.

15 Q And this is -- these are your -- in  
16 blue, in the darker shade, these are your comments  
17 to Samantha Kilpatrick?

18 A Yes.

19 R  
E  
D

21 What language are you referring to?

22 A The specific description of the sexual

1 contact between Dr. Hunt and REDACTED .

2 Q In what sense? Were there words? Was  
3 there a phrase that he wanted to have included?

4 MR. KLEIN: Objection as to form. You can  
5 answer.

6 BY MR. MACGILL:

7 Q Did he tell you there was a phrase he  
8 wanted included?

9 A I don't recall.

10 Q You don't recall, sir? This is nine  
11 days before the publication of the report. You  
12 don't recall what he was asking you to do, sir?

13 A Specifically as it pertains to the  
14 touching of the breasts or the pulling down of  
15 pants, I don't -- I don't recall.

16 Q But we talked about arm's length and  
17 whether you as an investigator should be at arm's  
18 length with your witnesses. Do you think Exhibit  
19 shows that you are arm's length with REDAC  
TED  
sir?

21 MR. KLEIN: Objection as to form. Calls  
22 for a legal conclusion. You can answer.

1 THE WITNESS: I think I handled the  
2 survivor and her husband appropriately.

3 BY MR. MACGILL:

4 Q But just one last question on Exhibit  
5 19. You are telling the court and jury you don't  
6 remember what he was asking you to do specifically  
7 nine days before the publication of the report?

8 A This does not refer to specific  
9 language, so it's difficult for me to answer your  
10 question.

11 Q Did you do what he told you, sir?

12 A No.

13 Q Did you do what he told you to do in  
14 this respect?

15 MR. KLEIN: Objection. He just answered  
16 that question. Exact question.

17 THE WITNESS: No.

18 BY MR. MACGILL:

19 Q No, you do not. That's your testimony?

20 A For the third time, no.

21 Q Right. You did not. Did you go to the  
22 CEO of your company and say nine days before the

1 publication of the report words to the effect of  
2 this has gotten completely out of control. This  
3 man is controlling our report, and I'm letting  
4 him. Did anything like that -- did you share  
5 anything like that that all bounds of fairness,  
6 all bounds of any reasonable proportion had been  
7 exceeded? Did you say anything like that to the  
8 CEO of the company?

9 MR. KLEIN: Objection. Compound. You can  
10 answer.

11 THE WITNESS: A decision not made solely  
12 by me was made to ensure that the survivor's  
13 description of sexual contact between Dr. Hunt and  
14 her be reviewed by REDAC to ensure that it was  
15 accurate. Now, when that came back and it had  
16 comments, those were considered. Ultimately, our  
17 version without the comments by REDACTED went  
18 into the final report.

19 BY MR. MACGILL:

20 Q Your testimony is that the nine -- to  
21 repeat -- nine different interviews you had with  
22 either or both of the REDACTE did not influence

1 this report to be in favor of their version and  
2 against Pastor Johnny Hunt?

3 MR. KLEIN: Objection as to form. Asked  
4 and answered. You can answer.

5 THE WITNESS: Guidepost Solutions had no  
6 agenda in investigating the allegations against  
7 Dr. Hunt. If Roy Blankenship had not talked to us,  
8 if Dr. Hunt had not talked to us the second time, we  
9 were comfortable with the report not going in as it  
10 relates to Dr. Hunt.

11 What we were not comfortable with is  
12 gathering facts. And because we weren't prepared,  
13 having made a draft, that it did not end up in the  
14 report.

15 BY MR. MACGILL:

16 Q Sir, would you turn to Exhibit 7 and  
17 look at the -- Exhibit 7. Let's start at the top  
18 of page 7.

19 REDAC  
TED

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1                   REDACTED

7       BY MR. MACGILL:

8           Q       Okay. And look at page 150 of your  
9       report. And at the bottom, the second-to-last --

10           MR. KLEIN: Hold on one second. He's not  
11       there yet.

12       BY MR. MACGILL:

13           Q       Second-to-last line.

14           MR. KLEIN: Let us know when you're there.

15       BY MR. MACGILL:

16           Q       Second-to-last line. It says: Survivor  
17       said he could come sit in the shade on her  
18       balcony. That's what your final report says,  
19       right?

20           MR. KLEIN: Objection to being his final  
21       report. It's guidepost's final report.

22

1 BY MR. MACGILL:

2 Q That's what the Guidepost final report  
3 says, right?

4 A That's what that sentence say, yes.

5 R  
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19           A       I don't know how much it would have  
20 weighed on my assessment of Dr. Hunt's actions.

21           Q       Well, wait a minute, sir. You did nine  
22 interviews with the REDACTE individually and

1 collectively, and wouldn't it be important to you  
2 as a matter of being independent and fair in your  
3 report or honest in your report -- let me state it  
4 to this: Wouldn't it be important to you in terms  
5 of being honest and forthright in the Guidepost  
6 report that the only other person besides Pastor  
7 Johnny Hunt who was actually present during the

8 REDACTED

10 A I don't know how to answer that  
11 question.

12 Q Sir, it's right here in black and white,  
13 the story that this document, Exhibit 7, confirms

14 REDACTED

16 your report, did you?

17 MR. KLEIN: Objection. He didn't draft  
18 this report. It mischaracterizes his testimony.  
19 You can answer.

20 BY MR. MACGILL:

21 Q You and everyone that you worked with,  
22 including the CEO of the company, took no steps to

1 include the description that the alleged victim  
2 here had began -- was beginning to feel foggy.  
3 Not one of you -- to repeat -- not one of you made  
4 any reference to that fact, did you?

5 MR. KLEIN: Objection. Asked and  
6 answered. That wasn't his testimony, but you can  
7 answer.

8 THE WITNESS: Again, I have to look.

9 BY MR. MACGILL:

10 Q Well, how about REDACTED, sir? Didn't  
11 you and those that work in concert with you in  
12 terms of publishing this report to the world,  
13 didn't you take any steps to make sure that  
14 REDACTED was taken by REDACTED prior to the  
15 time of this encounter were documented in your  
16 report?

17 A I don't remember reference to REDACTED  
18 at any point.

19 Q So you took, sir, an account of REDAC  
TED  
and the report of her husband that was made  
21 on events 12 years prior, and you didn't report  
22 REDACTED

1 right?

2 MR. KLEIN: Objection. Asked and  
3 answered. You can answer.

4 BY MR. MACGILL:

5 Q Right?

6 A I don't see it included in the report in  
7 front of me.

8 Q Now, would REDACTED alone be a reason  
9 independently to question what she reported in  
10 2022 about an encounter in 2010?

11 MR. KLEIN: Objection as to form. He  
12 never stated he was aware of REDACTED but he can  
13 answer.

14 THE WITNESS: In our interview with her on  
15 March 31st, she provided intimate embarrassing  
16 details to such a degree that our assessment after  
17 many hours in her recalling specific words said,  
18 touches made with hand and mouth on her body and  
19 specifics down to hair on Dr. Hunt's legs as she  
20 turned. With that degree of specificity, I feel as  
21 though whatever REDACTED she was on did not impair  
22 her ability to recollect very detailed,

1       embarrassing, painful facts to her.

2       BY MR. MACGILL:

3               Q       So again, I want to focus more on  
4       independent validations of what occurred or didn't  
5       occur here for a few more minutes, sir, just so we  
6       focus on what you did and what you failed to do.  
7       Turn to page 8 in the report.

8               MR. KLEIN:  Objection to the  
9       characterization of him failing to do anything.  But  
10      you can answer the question.

11      BY MR. MACGILL:

12              Q       Fair objection.  Let me just make sure  
13      that it's very clear.  Sir, you ignored completely  
14                                REDACTED

17              A       This is a -- I would say -- 53-page  
18      document, and the narrative that ended up in the  
19      final report was accurate but does not have the  
20      same degree of specificity that this document had  
21      including where people were seated in the  
22      condominium.

1

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1

REDACTED

1 reference that, right?

2 A No. Just the lack of consent for the  
3 sexual contact.

4 Q Well, that's not true, is it, sir. You  
5 began fabrications in your report on this. Here's  
6 what you said. The Guidepost report says only  
7 "Dr. Hunt slides closer while survivor was telling  
8 a story." That's what you said on the report at  
9 page 151, right?

10 A Let me look at it, sir. I don't have a  
11 photographic recollection of this document.

12 Q Please go to page 51 and go to  
13 paragraph number three.

14 A Okay. He moved closer to her.

15 Q Well, what Guidepost said is Dr. Hunt  
16 slid closer while survivor was the telling a  
17 story. Right? Those are your words -- slid  
18 closer -- right?

19 A I don't know that they are my words.

20 Q They are the words of Guidepost.

21 A They're the words that ended up in the  
22 report.

1           Q     And the inference of that is that there  
2     was something just unilateral on his part and that  
3     slid closure to her, right?

4           MR. KLEIN:   Objection as to form.

5           THE WITNESS:   Not necessarily.

6     BY MR. MACGILL:

7           Q     Let's look at what -- let's just remind  
8     you and the court and jury of what happened in  
9     this particular -- you know, you've admitted that  
10    according to REDAC,    REDACTED    to Pastor Johnny  
11                            REDACTED

12    That's what she said compared to what's written  
13    here.

14           MR. KLEIN:   Objection as to form as to  
15    what she actually said to him versus what's in a  
16    document he did not prepare, but he can answer.

17           THE WITNESS:   It's not contradictory.   It  
18    has less detail.

19    BY MR. MACGILL:

20           Q     Or is it characterized in the Guidepost  
21    language of Dr. Hunt REDACTED , is that a  
22    characterization of what actually happened as

1 contrasted with what is actually reported by the  
2 REDACTE themselves in the report?

3 A In the report? Yes. But she was  
4 interviewed on March 31st, and I would have to  
5 check the notes from that to see if she phrased it  
6 in a different manner on the 31st.

7 Q Okay. Well, if she said something  
8 different in the interview compared to what she  
9 wrote, would that be a reason for you to think  
10 that she wasn't credible?

11 MR. KLEIN: Objection as to form. Calls  
12 your speculation. You can answer.

13 THE WITNESS: To me, it's not  
14 contradictory.

15 BY MR. MACGILL:

16 Q They were different, sir.

17 A Did he slide over? Did he walk over?  
18 He's still in the end moved closer, whether it's  
19 characterized as a slide or a shuffle or two steps  
20 and a turn. Bottom line he moved closer.

21 BY MR. MACGILL:

22 Q REDACTED

1 REDAC  
TED

16 Q Consent is a big word in this case,  
17 isn't it, sir, in terms of what happened that  
18 night.

19 MR. KLEIN: Objection as to form. You can  
20 answer.

21 THE WITNESS: Yes. Especially as it  
22 relates to sexual contact.

1

REDACTED

12           Q     Okay. Now let's talk about the layout  
13 of the room. Are you familiar with what the room  
14 looked like, sir, of this alleged encounter?

15           A     In general terms.

16           Q     Okay.

17           A     It's a condominium I believe. Could be  
18 a two bedroom or one bedroom. I'd have to look at  
19 the plan.

20           Q     So let's look at Exhibit 7.

21           A     Okay. Where?

22           Q     Paragraph -- page 8, paragraph 4.

1           So sir, looking at page 8 of Exhibit 7, if  
2   you look at the fourth paragraph down, REDAC is  
3   sitting slouched backward. Do you see that? Do you  
4   see the paragraph I'm referring to.

5           A     Not yet.

6           Q     Johnny moved closer on the couch. Do  
7   you see that section?

8           A     Okay. Yes.

9           Q     All right. If you go down to the fourth  
10  paragraph --

11           MR. KLEIN: Fourth paragraph in that  
12  section. I'm sorry, Rob. I'm just going to point  
13  him in the right place.

14           THE WITNESS: Okay. Got it now.

15           BY MR. MACGILL:

16           Q     I want to focus on the second sentence.  
17  REDAC sat on the far left side of the couch next  
18  to the left armrest and end table. Johnny sat on  
19  the far right side of the couch.

20                   Do you see that.

21           A     I do see it.

22           Q     If you look at page 9, second paragraph,

1       REDACTED

18       BY MR. MACGILL:

19               Q       This is what she said in her report,  
20       Exhibit 8, which you had prior to the time that  
21       you and your firm, Guidepost, published the  
22       report.    Right?



1 MR. KLEIN: Objection. Objection.

2 There's no evidence as to who drafted it. The  
3 document speaks for itself.

4 BY MR. MACGILL:

5 Q Exhibit 7 and this sentence that I just  
6 read into the record, this was available to  
7 Guidepost and part of your file and part of your  
8 investigation in this work, was it not?

9 A We had this document.

10 Q Yeah. And you had, specifically it

11 REDAC  
TED

13 Is that right?

14 A That's what is written at the top of the  
15 document, yes.

16 Q Whose document is this? Who wrote this  
17 document?

18 R

19 Q And so this is something they handed to  
20 you on that day?

21 A That's right.

22 Q And so why is this the title, REDAC and

1 REDACTED

3 MR. KLEIN: Objection. You are asking why  
4 that's the title?

5 BY MR. MACGILL:

6 MR. MACGILL: Yeah.

7 MR. KLEIN: Objection.

8 BY MR. MACGILL:

9 Q Did you put that title on there? Did  
10 Guidepost put that on there?

11 A I didn't prepare this document.

12 Q So they gave this document to you in  
13 this form, Exhibit 7?

14 A Yes.

15 Q Okay. Handed it over to you.

16 A Yes.

17 Q Okay. Got it. All right. So they hand  
18 it over to you this information that has into it  
19 -- has specifically in the reference, it says

20 REDACTED

1 REDACT  
ED

15 A To her left, right?

16 Q Yeah. To her left, correct?

17 MR. KLEIN: Objection. Again, the  
18 document speaks for itself. You can read the words.

19 THE WITNESS: Tell me what sentence you  
20 are reading right now and then I can read it as well  
21 and agree to it.

22

1 BY MR. MACGILL:

2 Q Maybe this is more helpful. So anyone  
3 who was reading this carefully and paying  
4 attention to the facts of this case would  
5 understand specifically that when REDAC REDACTE  
D  
on

7 Pastor Johnny's side, right?

8 MR. KLEIN: Objection as to form. Are you  
9 asking if that's what the words say or that's what  
10 happened?

11 BY MR. MACGILL:

12 Q Answer the question.

13 A REDACTED

15 Q Which was on Pastor Johnny's side of the  
16 couch, right?

17 MR. KLEIN: Objection as to form. You can  
18 answer.

19 THE WITNESS: I don't know.

20 BY MR. MACGILL:

21 Q How could you not know, sir? You spent  
22 the entire day with them, and you had the

1 information right here in front of you. She  
2 describes to you where she was, right?

3 A It's described here.

4 Q And she describes to you where he was,  
5 right?

6 MR. KLEIN: Objection. Within the  
7 document or in their conversation on that day?

8 BY MR. MACGILL:

9 Q Both.

10 A My living room has three end tables. I  
11 don't know what end table she's referring to. It  
12 could be more than one end table. I -- I  
13 didn't --

14 Q Didn't pay attention in this particular  
15 detail, did you, sir?

16 A I read this particular detail.

17 Q But you ignored it. You ignored these  
18 details that you're just -- you can't testify to  
19 any of these details because you don't know them  
20 or understand them, do you, sir?

21 MR. KLEIN: Objection as to form. You can  
22 answer.

1 THE WITNESS: Not true.

2 BY MR. MACGILL:

3 Q All right then. Looking at couch, sir,  
4 which side of the couch was she seated on?

5 A Sat on the far left side of the couch.

6 Q Where was Pastor Johnny Hunt seated,  
7 sir.

8 MR. KLEIN: Objection. Are you asking for  
9 his memory or asking him read what the document  
10 says.

11 MR. MACGILL: I'm asking to testify to the  
12 most basic facts associated with an investigation he  
13 did not conduct in any way, shape, or form about who  
14 did what on that day. That's my question, sir.

15 MR. KLEIN: I'm asking just if you want  
16 his memory or if you want him to read from the  
17 document. That's all, Rob.

18 BY MR. MACGILL:

19 Q I want you to admit, sir, now that you  
20 are here and you are under oath, I want you to  
21 admit you don't know even know where Pastor Johnny  
22 was on the couch, right?

1 A That's not true.

2 Q Where was he?

3 A On the far right side of the couch.

4 Q Okay. She's on the far left side of the  
5 couch according to this report and according to  
6 your investigation, right?

7 A Right.

8 Q According to your investigation and this  
9 report, he's on the far right side of the couch,  
10 right?

11 A He's on the far right side of the couch.

12 Q Based on your work on this case, all the  
13 interviews you did, receiving Exhibit 7, where did  
14 **REDACTED**

16 MR. KLEIN: Are of asking him for his  
17 memory or are you asking him to read from the  
18 document you provided him?

19 MR. MACGILL: Answer the question.

20 MR. KLEIN: Objection. He needs -- I'm  
21 objecting to the question. He needs to understand  
22 it. If he's asking for his memory or if you are

1 asking him to read the words of the document.  
2 That's all. So he can answer your question  
3 accurately.

4 BY MR. MACGILL:

5 Q Sir, this is your chance to answer the  
6 questions. Based on all the work that you did;  
7 based on the interviews that you conducted; based  
8 on your communications of the people at Guidepost,  
9 all of them; based on your communications with the  
10 CFO; based on your one-day interview with the  
11 REDACTE; based on all the work that you did; were  
12 you able to ascertain where she REDACTED  
on that night?

14 A In the interview of her on the 31st I  
15 don't remember if we discussed -- I don't  
16 remember, I'd have to read my notes, if we jotted  
17 down where she REDACTED. But I can  
18 see from this document here, 53 pages long, that  
19 it says she placed it on the right -- on the end  
20 table right of the couch.

21 Q Which means she REDACTED  
22 according to this statement and according your



1 REDACTED

4 MR. KLEIN: Objection as to form.  
5 Mischaracterizes his testimony.

6 THE WITNESS: That's the way it reads in  
7 this document, yes.

8 BY MR. MACGILL:

9 Q And that's what your investigation  
10 showed, right? Did you pay attention to this fact  
11 in your work?

12 A To this particular fact? I don't know  
13 how much weight we gave to it. It did not end up  
14 in the final draft.

15 Q All right. Now, it didn't end up in the  
16 final draft, did it? But you understand for her

17 REDACTED

22 A Not necessarily. If there's a coffee

1 table she could walk around it to get to the end  
2 table. I'm not sure.

3 R  
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D

11 BY MR. MACGILL:

12 Q Okay. But did you -- okay. Another  
13 thing, sir. Did you even make an analysis  
14 yourself as to whether there was an end table next  
15 to her?

16 A I did not.

17 Q Well, sir, these are very basic facts  
18 about a series of events that you, for your part,  
19 are calling sexual abuse, right?

20 MR. KLEIN: Objection as to form. You can  
21 answer.

22 THE WITNESS: I'm sorry?

1 BY MR. MACGILL:

2 Q These are the -- you ignored the most  
3 basic facts about this evening in terms of what  
4 REDACTED

7 MR. KLEIN: Objection as to form and to  
8 the characterization. You can answer.

9 THE WITNESS: We can not ignore facts.

10 BY MR. MACGILL:

11 Q Okay. Well, you ignored this fact,  
12 didn't you? Was there an end table, sir -- was  
13 there an end table next to REDAC on the left side  
14 of the couch?

15 MR. KLEIN: Objection. Compound question.  
16 You can answer.

17 BY MR. MACGILL:

18 Q Was there an end table, sir, to  
19 REDACTE -- next to REDAC on the left side of the  
20 couch?

21 A I don't know.

22 Q Sir, how could you not know that in

REDACTED

1

22

1

REDACTED

13

A I see that written here.

14

15

Q And you didn't make any reference to  
that in your report, did you?

16

A It's not in the final report.

17

18

19

20

21

Q And let's talk about other things that  
are not in your report. You also didn't make  
anything -- put anything in the Guidepost report  
in terms of what you authored to confirm that her

REDACTED

1 Pastor Johnny Hunt, right?

2 MR. KLEIN: Objection. Asked and  
3 answered. You can answer one more time.

4 REDACTED

6 BY MR. MACGILL:

7 Q With respect to that, do you know how  
8 close she was in proximity Pastor Johnny Hunt when  
9 she REDACTED that she had taken off  
10 next to Johnny Hunt on the end table?

11 R  
E  
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D

20 Q Do you know any of these facts, sir?

21 A I'm reading it right here.

22 Q Do you know any of these facts, sir?

1           A       I'm reading it right here.

2           Q       You're reading but you don't understand  
3 what happened here, sir. You are speculating,  
4 aren't you now? Let me ask this question. You  
5 are speculating as to what happened. You never  
6 yourself in your investigation ascertained even  
7 the most basic fact of where REDACTE REDACTED  
8 that night, did you?

9           MR. KLEIN: Objection. I'm asking the  
10 witness not to answer. You've asked that same  
11 question three times. He's given you the exact same  
12 answer every time. Can we please move on to a  
13 different portion of this report?

14 BY THE WITNESS:

15          Q       He wrote a report without making any  
16 references to where she REDACTED right?

17          MR. KLEIN: Objection. Do not answer.  
18 Asked and answered. I just want to get through  
19 this. Let's move on.

20          MR. MACGILL: You can't instruct him not  
21 to answer.

22          MR. KLEIN: Rob, but if it gets to a point

1 where you are asking the same question name five  
2 times, Rob --

3 MR. MACGILL: He needs to answer my  
4 question.

5 MR. KLEIN: He answered your question five  
6 times. Five times he's answered your question. And  
7 I'm approximating five times, unlike your eight or  
8 nine. Five times approximately he's answered your  
9 question.

10 BY MR. MACGILL:

11 Q Sir -- so, let's talk about your company  
12 has refused to produce text messages -- do you  
13 know that -- in this case?

14 A No.

15 Q Do you know that the text messages that  
16 you reviewed have never been produced to us?

17 MR. KLEIN: Objection. Objection.

18 BY MR. MACGILL:

19 Q Do you know that, sir?

20 MR. KLEIN: Objection.

21 THE WITNESS: I'm not involved in the  
22 discovery process.



1 BY MR. MACGILL:

2 Q Sir, but do you know you read text  
3 messages in preparation for the deposition that we  
4 have never seen. Do you know that to be a fact?

5 A I do not.

6 Q All right, sir. Do you know  
7 specifically, in addition you are embargoing  
8 information about people that you claim support  
9 your report in this case, and you will not let  
10 Pastor Johnny Hunt know about that, right?

11 MR. KLEIN: Objection. Asked and answered  
12 in the morning session ad nauseam.

13 BY MR. MACGILL:

14 Q Right?

15 A We did not disclose the identities of  
16 witness one, two, and three this morning. That's  
17 what you are asking me?

18 Q Yeah. Right.

19 A The answer remains. Yes, we did not  
20 disclose those witnesses.

21 Q So for your part, can you give any  
22 justification, sir, to this court and jury as to

1 why you are withholding these three forms of  
2 evidence that I've just outlined for you in these  
3 last three questions?

4 MR. KLEIN: Objection. Asked and  
5 answered.

6 BY MR. MACGILL:

7 Q You may answer. Can you give us any  
8 reason why you are taking -- why you're doing what  
9 you're doing in keeping this evidence from us at  
10 this point in time, sir.

11 MR. KLEIN: Which evidence are you  
12 referring to, Rob?

13 BY MR. MACGILL:

14 Q The three questions that I just asked.  
15 You've withhold text messages. You've withheld  
16 from our client identify of witnesses, and we're  
17 not able to speak to our client. You've deleted  
18 in the ordinary course of business your text  
19 messages. You deleted in the ordinary course of  
20 text messages -- I'm sorry -- emails. You have  
21 failed -- you were asked to destroy documents and  
22 you haven't produced documents that were produced

1 by the REDACTED

2 My question, sir, is with respect to those  
3 five or six areas of conduct, can you tell this  
4 court and jury why your company is doing these  
5 things in this case?

6 MR. KLEIN: Objection. That  
7 mischaracterizes the witness's testimony. He is  
8 here as an individual. He is not here on behalf of  
9 Guidepost. He is not prepared and will not answer  
10 questions on behalf of Guidepost. He is not  
11 prepared and will not answer questions regarding  
12 Guidepost. Please move on.

13 BY MR. MACGILL:

14 R  
E  
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E  
D

17 MR. KLEIN: Objection. I believe we've  
18 already gone over this.

19 BY MR. MACGILL:

20 Q Answer the question, sir?

21 MR. KLEIN: Are you asking for his memory,  
22 Rob, or should he refer to Exhibit 7?

1                   MR. MACGILL: His recollection based on  
2 his investigation.

3                   THE WITNESS: I don't recall that detail.

4 BY MR. MACGILL:

5           Q       Can you tell the court why you didn't

6                               REDACTED

                  Why you did not include that in your  
8 report?

9           A       As I mentioned earlier, this document is  
10 53 pages long, and our final section regarding the  
11 incident with Dr. Hunt is much shorter naturally.  
12 It doesn't have the same degree of detail.

13          Q       So looking back at the Exhibit 7, sir,  
14 page 10, last paragraph, so the last paragraph

15 REDAC  
TED

20                   Do you see those words in this Exhibit 7?

21          A       I see the words.

22          Q       Sir, go to page 11.

1

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REDACTED

A Those words are not in our final draft.

Q Now, sir, page 151 of your report. I want to contrast what we just covered with what you wrote in your report, what Guidepost wrote in its report. If you look at page 151 -- if you look at the third full paragraph about three quarters of the way down, the sentence: But then he forced himself...

Do you see that?

A Uh-huh.

Q It says the following: But then he forced herself on her again by groping her, trying to pull her shirt down and violently kissing her.

Do you see that?

A I do.

Q That's not in the story -- that's not in Exhibit 7, is it? Those words?

A They do not match.

Q And then speaking of things, sir, that do not match, your report, Guidepost report, also says: Survivor did not reciprocate, but rather

1 stood eyes wide open and very stiff.

2 Do you see that?

3 A I do see it.

4 Q That's different from what we just read  
5 on pages 10 and 11, isn't it, sir.

6 A What is on page 151 is consistent with  
7 what we were told when we interviewed her on  
8 March 31, 2022.

9 Q When was this -- are you saying that --  
10 so you're saying that if she said something  
11 different from what she wrote in this Exhibit 7,  
12 you would go with the words spoken to you rather  
13 than Exhibit 7?

14 A What has ended up in the final report  
15 and what we wrote from our notes is not a  
16 word-by-word accounting of this document here in  
17 my right hand.

18 Q But sir, this document here in your  
19 right hand is Exhibit 7. If you were going to be  
20 true to what actually happened that night,  
21 wouldn't it be appropriate, sir, if you were going  
22 to do an independent and fair investigation here,

1 to report what she actually wrote about the  
2 incident as compared to how you characterized the  
3 incident in the Guidepost report.

4 MR. KLEIN: Objection. You can answer.

5 THE WITNESS: Her being on the receiving  
6 end of the physical contact and not fighting back,  
7 to me, does not describe her as an equal party to  
8 the moment. REDACTED

To me, that's -- that's different. That's  
10 more reflective of not reciprocating.

11 BY MR. MACGILL:

12 Q Now, sir, in your interview notes of  
13 that day, you wrote some interview notes on  
14 March 31, 2022, right?

15 A I did write some notes.

16 Q And your notes are different from -- to  
17 repeat -- your notes are different from the  
18 Guidepost report, aren't they?

19 BY MR. KLEIN: Objection.

20 BY MR. MACGILL:

21 Q On what happened that night.

22 MR. KLEIN: Objection.



1           THE WITNESS: I would need to see them to  
2 answer that question.

3 BY MR. MACGILL:

4           Q     You don't -- you don't recall  
5 understanding in fact that what is written in that  
6 Guidepost report is different from Exhibit 7 and  
7 different from your own notes?

8           MR. KLEIN: Objection as to form. You can  
9 answer.

10          THE WITNESS: What ended up in the final  
11 report would be of less detail than what our notes  
12 reflected in that full day of meetings. But if you  
13 are asking me if it's contradictory, I need to  
14 see -- if that's what you're alleging, I would need  
15 to see the two side by side.

16 BY MR. MACGILL:

17          Q     Sir, on page 151 you said: Survivor did  
18 not reciprocate.

19                 Do you see that?

20          A     I do see it.

21          Q     And it continues: Survivor did not  
22 reciprocate but rather stood up, eyes open and

1 very stiff, hoping he would just stop and leave.

2 Right?

3 A Yes.

4 Q But what your own interview notes say is

5 that, REDACTED

6 right?

7 MR. KLEIN: Objection as to form. Are you  
8 asking him to memorize his interview notes.

9 BY MR. MACGILL:

10 Q You may answer.

11 A I see in Exhibit 7 the quote you just  
12 said. REDACTED

13 REDACTE

14 Q And that's what your interview notes  
15 said, right?

16 A I don't know.

17 Q Well, she went with it -- your interview  
18 from that day: REDACTED

RE

20 Do you recall saying that, sir?

21 MR. KLEIN: Objection. Asked and answered  
22 three times. I direct you not to answer again. If

1     you want to show him the interview notes, have at  
2     it, or not. You keep asking the same question in  
3     hopes of a different answer.

4             MR. MACGILL: What was his answer?

5             MR. KLEIN: His answer was the same thing.  
6     He needs to see the report.

7     BY MR. MACGILL:

8             Q     Do you recall writing in your notes from  
9     March of 2022 that specifically     REDACTED

11            A     I don't remember that exact quote.

12            Q     But the words     REDACTED  
13     REDACTED     never found it into the final  
14     report on page 151, did it?

15            A     Let me look and see.

16            Q     We're referring to page 151.

17             MR. KLEIN: He's going to look at the  
18     entire section he said.

19             THE WITNESS: It does say "hoping he would  
20     just stop and leave."

21     BY MR. MACGILL:

22            Q     But the words that I just read to you

1 never found it in page -- never found -- they were  
2 never published here in section -- or page 151,  
3 were they?

4 A Didn't you just say hoping he would just  
5 stop and leave.

6 Q The words REDACTED  
Did those words find it into  
8 page 151?

9 A Some of them did.

10 Q Some of them did. You feel it was your  
11 job to characterize information reported to you in  
12 your meeting?

13 A The survivor reviewed the description  
14 before it went in the report to make sure that it  
15 was accurate, and so when she confirmed that that  
16 was an accurate statement, we included it.

17 Q Did you feel that you had the right to  
18 edit, to make changes to what your notes said in  
19 the final report?

20 A I haven't seen my notes.

21 Q Did you feel like you had the right to  
22 do that, to make changes to what your interview

1 notes said about the incident?

2 A I have the right to change my notes? I  
3 wouldn't have changed my notes. My notes are my  
4 notes.

5 Q Did you have the right to write  
6 something different in the report than is included  
7 in your notes when you describe this incident?

8 MR. KLEIN: Objection as to form. You can  
9 answer if you can.

10 BY MR. MACGILL:

11 Q Let me ask a better question. Do you  
12 believe, sir, that as acting as an independent  
13 investigator here that you had discretion to edit  
14 the words that are contained in your interview  
15 notes when you wrote the report?

16 MR. KLEIN: Action as to form. You can  
17 answer.

18 THE WITNESS: I wouldn't edit my interview  
19 notes. I stand by the accuracy of this report.

20 BY MR. MACGILL:

21 Q You understand that I'm not asking you  
22 whether you would edit your notes. I'm asking

1 where you would write something different in your  
2 report than your notes state?

3 MR. KLEIN: That's a different question.  
4 You can answer that question.

5 THE WITNESS: If I had three pages of  
6 notes to describe a particular aspect of the  
7 sexual -- unwanted sexual contact between Dr. Hunt  
8 and REDACTED and it ended up being less than  
9 that, it wouldn't necessarily be inaccurate or  
10 contradictory. It would just be less detail.

11 BY MR. MACGILL:

12 Q Was there financial pressure on your  
13 company to come up with something in this report  
14 to justify million of dollars of expenditures?

15 A We had no pressure whatsoever to produce  
16 anything, either position or negative. We had  
17 freedom under the agreement to produce an  
18 independent report. We did not have pressure to  
19 write any part of the report about Dr. Hunt. That  
20 report without Dr. Hunt is a report that we could  
21 have been proud of. That said, this part of the  
22 report that does involve Dr. Hunt is accurate, and

1 I have no issue with it.

2 Q REDACTED

13 MR. KLEIN: Hold on before you answer.  
14 Can you tell me where you are reading from so I can  
15 just make sure you read it --

16 MR. MACGILL: No. I'm just going to ask  
17 my question. I'm not going to have any more  
18 harangues on this.

19 BY MR. MACGILL:

20 Q REDACTED

1 REDACTED

5 MR. KLEIN: And before you answer that,  
6 I'd like to know that you are reading it correctly,  
7 Rob. So if you can point me to the page just so I  
8 can follow along, which is a simple professional  
9 courtesy, I want to make sure you're reading it  
10 accurately into the record as you are reading from  
11 a document and then asking my client to comment on  
12 the accuracy of words you are reading, though  
13 pretending -- or preventing us from knowing if you  
14 are reading it accurately. Please just tell me the  
15 page so I can follow along.

16 MR. MACGILL: Page 12.

17 MR. KLEIN: Thank you. Give me one  
18 second. Now that I'm on page 12, if you can then --

19 BY MR. MACGILL:

20 Q REDACTED

22 Do you recall that, sir?



1                   MR. KLEIN: Where are you reading on page  
2 12? There are six paragraphs on page 12.

3                   MR. MACGILL: I'm not reading on page --  
4 I'm not reading anymore.

5 BY MR. MACGILL:

6           Q                   REDACTED

9                   Do you recall that, sir?

10          A           I do not recall that.

11          Q           Now, you don't -- you didn't include  
12 that particular comment or words to that effect in  
13 your report, did you?

14                   MR. KLEIN: Objection. There's no  
15 evidence those words were spoken to him. He said he  
16 did not recall those words.

17                   THE WITNESS: I just said she could not --

18                   MR. KLEIN: There's no question before  
19 you.

20 BY MR. MACGILL:

21          Q           So you don't recall those -- you don't  
22 -- you did not include those words in the

1 Guidepost final report, right?

2 A I don't see those words.

3 Q Right. And again, looking at whether  
4 your report was independent, truthful, wouldn't  
5 that be important information to give a fair  
6 rendition of the events involving this incident.

7 MR. KLEIN: Objection as to form. You can  
8 answer.

9 THE WITNESS: I think how the survivor  
10 reacted to aggression is important. There were  
11 multiple steps that are common -- push towards and  
12 then back off, and there were multiple words spoken  
13 and actions taken and not every single word spoken  
14 or action taken ended up in the document. Yet I  
15 stand by the accuracy of this document.

16 BY MR. MACGILL:

17 Q Let's talk about accuracy and whether  
18 there was any fair work by you or the people you  
19 work with in this connection. Look at page 152,  
20 the top of the page. This is your final report in  
21 your hand, right?

22 MR. KLEIN: Objection as to has final

1 report. You can answer.

2 A This is --

3 Q Guidepost. Right.

4 A Guidepost's final report.

5 Q And this is -- you were a lead  
6 investigator on this report.

7 A I was one of the two lead investigators  
8 in this section of the report.

9 Q Did you read this section before it was  
10 published?

11 A Yes.

12 Q Did you approve it?

13 A I concurred with it.

14 Q Did you approve of every word of this  
15 particular section?

16 A I posed no objection to any word in this  
17 section.

18 Q Okay. And did you understand as you  
19 reviewed this section that it ought to be fair in  
20 terms of what was included and what was not  
21 included?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I didn't see any fundamental  
3 unfairness in what was written there.

4 BY MR. MACGILL:

5 Q Did you believe that you needed to be  
6 fair with what you included and didn't include in  
7 your contributions to this portion of the report  
8 on the sexual involving Pastor Johnny Hunt?

9 A Yes. And that's why I made \*\* and  
10 talked to Dr. Hunt and gave him the same  
11 opportunity to provide hours and hours of detail  
12 on his version of the events, but he denied any  
13 physical contact whatsoever.

14 Q All right. Let's talk about you for a  
15 minute.

16 A Look at the top page and let's look at  
17 what you did and what you failed to include.

18 MR. KLEIN: Objection to the  
19 characterization. If you have a question, by all  
20 means, ask it.

21 BY MR. MACGILL:

22 Q Sir, I want to focus on what you failed

1 to do with my next question. At the top of the  
2 page, you say --

3 MR. KLEIN: What page are you on?

4 MR. MACGILL: The same page. 152.

5 MR. KLEIN: Thank you.

6 BY MR. MACGILL:

7 Q Hunt stated said he would like to have  
8 sex with her three times a day. Do you see that?

9 A I do.

10 Q You approved these words, didn't you?

11 A I wasn't the approving official.

12 Q You signed off on these words, didn't  
13 you?

14 A I did not pose any objections to the  
15 words used.

16 Q And then you continue: The survivor  
17 could not believe what she was hearing and could  
18 not get inside her condo quickly enough. That's  
19 what you wrote on this, right?

20 MR. KLEIN: Objection. You can answer.

21 THE WITNESS: I don't know that I'm the  
22 author of that particular sentence.

1 BY MR. MACGILL:

2 Q REDACTED

9 A Where is that? I don't see that on  
10 page 12.

11 Q Page 12, 2nd line.

12 A Okay. I see it here in writing.

13 Q REDACTED

16 A It's not in the final report.

17 Q It's not in the Guidepost report, is it?

18 A Correct.

19 Q REDACTED

22 A I would need to look at my interview

1 notes to see if she said that on March 31st.

2 Q Well, she sure didn't say it in  
3 paragraph 12 -- or page 12, top paragraph, did  
4 she?

5 A It's not in this document on page 12 in  
6 the same paragraph.

7 Q All right.

8 A I don't know if it's somewhere else in  
9 the document or if it's in the interview notes  
10 from March 31, 2022.

11 Q So were you trying to create impressions  
12 rather than report facts here in this particular  
13 paragraph, sir?

14 A No. We were trying to report the facts.

15 Q But you have no fact. There's nowhere  
16 anywhere where there's a phrase where it is said  
17 that she couldn't get back into her condo quickly  
18 enough. That appears nowhere in this record, does  
19 it, sir?

20 MR. KLEIN: Objection. Mischaracterizes  
21 his technology. You can answer.

22 THE WITNESS: As I mentioned earlier, the

1 level of detail in this REDACTED is less  
2 than the final document than it is in the REDACTED

4 BY MR. MACGILL:

5 Q But nowhere in this record, sir -- we  
6 have all the papers here, you can look at what you  
7 want, but there is nowhere in this record where  
8 she made reference at any time anywhere that "I  
9 could not get back to my condo fast enough."

10 MR. KLEIN: Objection. Mischaracterizes  
11 his testimony. You can answer.

12 THE WITNESS: It's not in the document.

13 BY MR. MACGILL:

14 Q Not in any document, is it, sir?

15 MR. KLEIN: Objection. You can answer.

16 BY MR. MACGILL:

17 Q It's not in any document anywhere.

18 A Those are your words.

19 Q No, I'm asking you, sir. That  
20 characterization is not in any --

21 A No. It's in the final report.

22 Q Yeah. It's not in any document except



1 your document. That's no reference in Exhibit 7.  
2 There's no evidence anywhere in the record of  
3 proceedings than this -- any interview notes  
4 anywhere.

5 A That's your statement. I've would need  
6 to see my interview notes to verify that or  
7 Samantha Kilpatrick's interview notes to verify  
8 that.

9 Q Now, let's say --

10 A Ultimately, as I said earlier, the  
11 survivor herself looked at the description to  
12 ensure 100 percent accuracy of what we reported.  
13 And that is why we let her review it.

14 Q Now, if it's not there, if there's no  
15 reference anywhere in the record here to that  
16 phrase, that she couldn't get back into her condo  
17 quickly enough, you would agree that that would be  
18 misleading and unfair on your part in terms of how  
19 you depicted the events between Pastor Johnny Hunt  
20 on the one hand, and REDACTED on they other.

21 MR. KLEIN: Calls for speculation. You  
22 may answer.

1                   THE WITNESS: That's a hypothetical I'm  
2                   not comfortable answering.

3                   BY MR. MACGILL:

4                   Q                   REDACTED

19                  Q           And not only to you but to Samantha B.  
20                  Kilpatrick, right?

21                  A           That's correct.

22                  Q           Now, you didn't reference anywhere in

1 the Guidepost -- or I should say -- let me  
2 restart.

3 REDACTED

7 A I need to look at the report to answer

8 REDACTED

1

REDACTED

21

R  
E  
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A

18 Q Okay. And what you are claiming now --  
19 what you are claiming is what you read is the same  
20 as I just read; is that right?

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1 THE WITNESS: I never --

2 MR. KLEIN: Let me finish the objection so  
3 the reporter can get it down.

4 Objection. Mischaracterizes his  
5 testimony. You can answer.

6 THE WITNESS: It's not the same, but it's  
7 not contradictory.

8 BY MR. MACGILL:

9 R  
E  
D  
A  
C  
T  
E  
D

1           REDACTED

3           BY MR. MACGILL:

4           Q       And it was Guidepost -- to repeat -- it  
5           was Guidepost that made the decision to leave  
6           these two facts out of the final report, right?

7           MR. KLEIN:  Objection.  He's here in his  
8           individual capacity.  He can answer in that regard.

9           THE WITNESS:  I did not take that out of  
10          any draft.  I did not suggest putting that into any  
11          draft.

12          REDACTED

1

REDACTED

20           Q       So but the final report says that the  
21 meeting was at FBC Woodstock. Is that in error?

22           A       There was a meeting at FBC Woodstock in



1     that same week, but apparently it's REDACTED  
2     church, REDACTED church and not Dr. Hunt's church  
3     with the very first meeting happening Monday  
4     evening.

5             Q     On page 152 your final report is  
6     incorrect in saying the meeting was at FBC  
7     Woodstock?

8             MR. KLEIN:   Objection as to form.   I'm not  
9     sure that was his testimony, but you can answer.

10            THE WITNESS:   I'm not 100 percent sure.

11     BY MR. MACGILL:

12             R  
              E  
              D  
              A  
              C  
              T  
              E  
              D

1

REDACTED

1 Do you see that?

2 A I do see it.

3 Q Now, in the final report Guidepost wrote  
4 on page 153, Dr. Hunt asked for pastor's  
5 forgiveness, and pastor said he agreed. That's  
6 what you wrote, right?

7 A Correct.

8 Q And that's different, sir, isn't it,  
9 than what the REDACTED

12 A This document is -- yes.

13 Q So did you understand that you were  
14 writing something different than what the REDACTED  
when you said in the final report  
16 "Dr. Hunt asked for pastor's forgiveness, and the  
17 pastor said he agreed."

18 A Again, I'll have to refer back to what I  
19 said a few times now, that we interviewed REDACT on  
20 March 31, 2022. And this document, we were not  
21 present during its drafting. It did not oversee  
22 how the information was put to paper. And we put

1 more weight on the firsthand account in  
2 debriefing, interviewing, REDACTED . And I  
3 don't have my notes in front of me. So perhaps in  
4 those notes I would see. And ultimately, the  
5 survivor viewed this and approved of the language,  
6 and her husband.

7 Q Do you agree, sir, that as a part of  
8 your work that you understood specifically that  
9 REDACTED had used a type journal to  
10 narrate their storey from 2010 to present? Did  
11 you understand that?

12 A I'm sorry. Can you repeat the question?

13 Q Yeah. Did you understand specifically  
14 that REDACTED had met with you and  
15 your coinvestigator over an entire day and that  
16 you used a type journal -- the REDACTED had used a  
17 type journal to narrate their story from 2010 to  
18 present.

19 A They had this document present that day,  
20 but he -- we interviewed REDACT specifically and  
21 caused her to provide in great detail what  
22 happened on July 25th, 2010.

1           Q     And then you made -- you followed along  
2     their narration along with copies that were  
3     provided of Exhibit 7, right?

4           A     As best we could, we tried to follow  
5     along, but she was telling her story, and we  
6     wanted to give our undivided attention to her but  
7     were there to hear it from her and not read it off  
8     a     REDACTED     , to have the ability to ask  
9     questions.

10          Q     And then what you did in your interview  
11     notes is, as they narrated their story, you then  
12     created a timeline and typed the timeline up as  
13     you -- as they went through their description,  
14     right?

15          A     If they told the story in a  
16     chronological linear fashion, in all likelihood  
17     our notes would have been linear as well and  
18     chronological. But I don't have those notes s in  
19     front of me to refer to.

20          Q     Sir, I'm looking at your notes of the  
21     meeting that you had. Did you take notes -- do  
22     you recall taking notes on this August 5, 2010,

1 meeting that we've been focused on here in these  
2 last series of questions?

3 A I don't have my notes in front of me.

4 Q REDACTED

8 A Roy Blankenship.

9 Q Continuing: REDACTED

11 A Yes.

12 Q And JH is Pastor Johnny Hunt.

13 A Yes.

14 Q Your entry here says: REDACTED

16 A I don't.

17 Q And your final report didn't say  
18 anything like that. It said instead, Dr. Hunt  
19 asked for Pastor's forgiveness and pastor said he  
20 agreed. That's what you wrote on page 153.

21 MR. KLEIN: Objection. You read one  
22 sentence from all those interview notes, so I would

1 object to the characterization of the entirety of  
2 his notes from -- going from one sentence. But you  
3 can answer if you can.

4 THE WITNESS: Samantha Kilpatrick would  
5 have taken notes as well. REDACTED would  
6 have reviewed --

7 MR. MACGILL: Why don't we take a break  
8 now and then go to the next exhibit.

9 MS. CALLAS: He's not finished.

10 MR. KLEIN: He's in the middle of an  
11 answer. Are you withdrawing the question?

12 BY MR. MACGILL:

13 Q No. Do you have more to say?

14 A I was halfway through my response.

15 Q Go ahead, please. I'll have her read my  
16 question and the portion of your answer and then  
17 go -- finish it.

18 (Whereupon, the Reporter read the record  
19 as requested.)

20 THE WITNESS: The final session of the  
21 draft to ensure we accurately reported that event.

22

1 BY MR. MACGILL:

2 Q And the last question before we take a  
3 break, your notes confirm what's in the report of  
4 the REDACTED Exhibit 7, don't they?

5 MR. KLEIN: Objection.

6 BY MR. MACGILL:

7 Q The notes you took during the March 31,  
8 2022, meeting?

9 A You told me they do. I haven't seen my  
10 notes.

11 MR. MACGILL: Okay. Let's take a break.

12 VIDEOGRAPHER: Off the record at 17:03.

13 (Whereupon, a brief recess was taken.)

14 VIDEOGRAPHER: Back on the record at  
15 17:11.

16 (HOLSKE Exhibit Number 20 was marked for  
17 identification.)

18 BY MR. MACGILL:

19 Q Sir, we're going to show you Exhibit 20  
20 in an electronic format.

21 MR. SANDERS: So the Bates number is --  
22 for the page is GP007645. It's an eight-page



1 document, and the last page Bates number is  
2 GP007652.

3 BY MR. MACGILL:

4 Q Sir, do you have that Exhibit 20 in  
5 front of you?

6 A I do.

7 Q Can you tell us what this is?

8 A These are interview notes from  
9 March 31st, 2022.

10 Q Did you create these notes?

11 A Forgive me. I'm just looking to see if  
12 they are mine or Samantha's notes. It would be  
13 one of the two of us that created this document.  
14 We're the only two present.

15 Q Can you tell by looking at them whether  
16 you prepared these or whether your colleague did?

17 A I don't want to -- similar to the text  
18 messages you showed me, I thought Samantha was in  
19 the right column and I was in the left. I don't  
20 want to make a mistake here. So...

21 Q All right. So let's -- did you rely on  
22 these as a part of your work?

1           A       I would say that these notes by me or by  
2       Samantha would be reflective of the interview that  
3       day.

4           Q       With the REDACTED ?

5           A       On the 31st of March.

6           Q       And to the best of your knowledge they  
7       are an accurate description of what they said to  
8       you?

9           A       Yes. I would say so.

10          Q       All right. Now, in Exhibit 7, I've been  
11       asking you about the REDACTED

16                   Do you remember those questions.

17          A       Yes.

18          Q       In then remember in your report what you  
19       said is something different. You said -- now in  
20       the final report what you said is -- this is  
21       page 153: Dr. Hunt asked for pastor's forgiveness  
22       and pastor said he agreed.

1 Do's you remember that?

2 A I don't but let me look and then I'll  
3 say if that's what was here, then I'll agree.

4 Q Page 153.

5 A Okay.

6 Q Do you see where you wrote the Guidepost  
7 report --

8 A Yes, I see. Dr. Hunt asked for pastor's  
9 forgiveness and pastor said he agreed.

10 Q And now that you're -- you see there's a  
11 different between the final report and Exhibit 7,  
12 right?

13 MR. KLEIN: Hold on. Just to make sure  
14 he's referring to Exhibit 7, not the iPad. So just  
15 make sure you're on the same page with the --

16 THE WITNESS: That's right.

17 BY MR. MACGILL:

18 Q Exhibit 7 and your report are different,  
19 aren't they?

20 MR. KLEIN: Objection. Asked and  
21 answered, but you can answer again.

22 THE WITNESS: Can I look here at.

1 BY MR. MACGILL: --

2 Q Yeah.

3 A -- page 7?

4 Q Page 16, Exhibit 7.

5 A Sixteen.

6 Q REDACTED

11 Q You indicated before that your interview  
12 notes might be showing that there was a basis for  
13 page 153. Do you remember that line of testimony?

14 A Yes.

15 Q All right. Let's look at the interview  
16 notes and specifically the entries of August 5.  
17 Could you go back there? Are you on August 5?

18 A I'm here.

19 Q And the interview notes say the  
20 following: R

E  
D  
^

22 Do you see that?

1           A       I see it.

2           Q                   REDACTED

4           A       Yes.

5           Q       First bullet point of your interview  
6 notes, the Guidepost interview notes.   REDACTED

8                       Do you see that?

9           A       I do.

10          Q                   REDACTED

12          R  
13          r

13          Q       That's what your notes from the meeting  
14 say.   Agreed?

15          A       That's what these notes say.

16          Q                   REDACTED

21          A       Correct.

22          Q       And then your notes also say:   RED  
                                  LOG

1 R  
E  
D  
A  
C  
T  
E  
D

21 Q Those are all part of your notes,  
22 correct?

1           A       Yes.  Those are -- in these notes that  
2       are either mine or Samantha's.

3           Q       Now, in reality, you didn't put any one  
4       of these bullet points from your notes in your  
5       report, did you?  In the Guidepost report I should  
6       say.

7           A       Not with this level of detail, but I  
8       don't see them as contradictory.

9           Q                               REDACTED

REDACTED

BY MR. MACGILL:

Q In the final report, the Guidepost report, it is Pastor Johnny who is asking for forgiveness, isn't it.

MR. KLEIN: Objection. Asked and answered.

THE WITNESS: Yes.

BY MR. MACGILL:

Q And you made an intentional decision, sir, you and those working in concert with you to intentionally alter the story on this matter to fit the narrative that you wanted to create of creating REDACT. Right?

MR. KLEIN: Objection. Mischaracterizes want testimony. You can answer.

THE WITNESS: Incorrect.



1 BY MR. MACGILL:

2 Q You wanted to tell an explosive story,  
3 didn't you, sir?

4 MR. KLEIN: Objection. You can answer.

5 THE WITNESS: Incorrect.

6 BY MR. MACGILL:

7 Q Okay. But with respect to events of  
8 REDACTED , you came to understand that there  
9 was a meeting between REDACTED and Johnny Hunt  
10 on REDACTED

11 A REDACTED No.

12 Q No?

13 A I don't see REDACTED , either in  
14 Exhibit 7 or Exhibit 20 you just gave me.

15 Q All right. Well, look at Exhibit 7, and  
16 if you turn to page 17 --

17 A Okay.

18 Q REDACTED

20 A Right. But I don't see Dr. Hunt as a  
21 party to that conversation.

22 Q REDACTED

1 REDACTED

6 Q Did there make you understand there had  
7 been marital problems?

8 MR. KLEIN: Objection as to form.

9 THE WITNESS: My understanding is that  
10 that's the narrative that was implanted by Roy  
11 Blankenship in the aftermath of the event, and there  
12 was no ability for REDACT or REDACT to discuss the  
13 event itself. Their directive was to forgive,  
14 forget, and move on.

15 BY MR. MACGILL:

16 Q Well, here it says, sir, this is their  
17 own story where it says that REDACT, for her part,

18 REDACTED

19 Do you see that?

20 A I do see it.

21 Q Are you saying that the Mr. Blankenship  
22 caused her to write those words?

1           A       I am saying that there were counseling  
2 sessions with Roy Blankenship and that was the  
3 narrative that was implanted upon them to forgive,  
4 forget, and move on with no focus to the actual  
5 physical contact between Dr. Hunt and her on  
6 July 25th, 2010, and that they were to focus on  
7 themselves as a couple as the root cause of what  
8 happened on January 25th, 2010.

9           Q       Are you saying that Mr. Blankenship  
10 somehow forced                   REDACTED

14                   MR. KLEIN: Objection. You can answer.

15                   THE WITNESS: I didn't say that.

16 BY MR. MACGILL:

17           Q       So why did you give us the paragraphs of  
18 testimony that you just did? Why are you blaming  
19 Mr. Blankenship for something. Are you blaming  
20 him -- strike that.

21                   Are you blaming Mr. Blankenship for the  
22 written words here:                   REDACTED

1           REDACTED

2           A       What I'm saying is that after the  
3       REDACTED are requested to meet with Dr. Hunt and  
4       Roy Blankenship on August 2nd, and then again on  
5       August 5th, and instructed that they cannot talk  
6       about what happened between Dr. Hunt and REDACT and  
7       that they need to forgive, forget, and move on;  
8       and REDACT has stated that he forgives him, that  
9       the focus, according to both REDACTED, by Roy  
10      Blankenship was that their marriage was the  
11      problem and that the assault was not the problem  
12      and was to not be spoken about.

13          Q       Did anyone say this to you? Are you  
14      just giving an opinion, or did somebody say those  
15      exact words?

16          A       I'm not giving an opinion.

17          Q       Who said those words to you, sir?

18          A       I'm paraphrasing what I was told by the  
19      REDACTED

20          Q       In which interview did they tell you  
21      this?

22          A       They talked about it various times about

1 a false narrative and about the counseling, not  
2 being allowed to talk about July 25th, 2010.

3 Q Did REDACTE reach out to Pastor Johnny  
4 after the allegation incident?

5 MR. KLEIN: Objection as to form. You can  
6 answer.

7 THE WITNESS: As you pointed out earlier,  
8 two days later, there was an attempt to confront  
9 Dr. Hunt.

10 BY MR. MACGILL:

11 Q I didn't say confront. I said reach  
12 out. Did she reach out -- did REDACTED reach  
13 out to Pastor Johnny Hunt at sometime in December  
14 of 2022?

15 A That's a different questions.

16 MR. KLEIN: Yes. And objection as to form  
17 as to his knowledge, but he can answer.

18 THE WITNESS: I don't recall.

19 BY MR. MACGILL:

20 Q So looking at page 26, sir, of this  
21 Exhibit 7, in the last paragraph, sir. So looking  
22 at the second paragraph, the second sentence --

1     third sentence: R  
                          E  
                          D  
                          ^

3                     Do you see that?

4             A       Yes.

5             Q       Continuing,               REDACTED

8                     Do you see those words, sir?

9             A       I do.

10            Q       And it's reported here by the REDACTED

14                    Do you see that?

15            A       Yes.

16            Q                               REDACTED

19                    Do you see that?

20            A       I do see it.

21                    R  
                          E  
                          D  
                          ^

1 MR. KLEIN: Objection -- sorry, Rob.  
2 Objection as to form. You can answer.

3 THE WITNESS: I'm aware of that and a lot  
4 of other intimate details including her being  
5 encouraged to write REDACTED to her family  
6 members, to REDACTED family, as she was dealing with  
7 this trauma. All at the encouragement of Roy  
8 Blankenship.

9 (HOLSKE Exhibit Number 21 was marked for  
10 identification.)

11 BY MR. MACGILL:

12 Q I'm going to hand you Exhibit 21, sir.  
13 Did you write this email on REDACTED , to  
14 Samantha Kilpatrick?

15 A Yes.

16 Q And you say: REDACTED

19 REDACTED

1

R  
E  
D  
A

3

Do you see that?

4

A I do see it.

5

Q Why were you interested in not having a

R  
E

7

A I don't know.

8

9

Q Were you trying to hide details of your  
connections in your work with REDACTED , sir?

10

11

MR. KLEIN: Objection. Asked and  
answered.

12

13

14

THE WITNESS: No. My contact connections  
with REDACTED were well known to the entire  
team.

15

BY MR. MACGILL:

16

17

18

Q But not to people like Pastor Johnny  
Hunt. We didn't know about anything as between  
you and REDACTED , did we?

19

20

21

22

Well, let me ask a better question. You  
certainly didn't say one word about your interviews  
with REDACTED and your exchanges of emails and  
texts when you met with Pastor Johnny Hunt the first



1 time, did you?

2 A The first time I did not. The second  
3 time I did.

4 Q You did -- you didn't in April? You did  
5 not in April.

6 MR. KLEIN: Objection. We've gone over  
7 this a dozen times.

8 BY MR. MACGILL:

9 Q What documents did you hand over to  
10 Pastor Johnny Hunt in May of 2022?

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: I did not pass him any  
14 documents in May of 2022.

15 BY MR. MACGILL:

16 Q Did you tell him that, just like you say  
17 here, that your work in this case as a Guidepost  
18 representative and as a leading negotiator  
19 involved you from time to time making sure there  
20 was quote no REDACTED

21 A I don't understand your question.

22 Q Well, what you are saying here is you

1 are telling your colleague that you were going to  
2 take steps to make sure REDACTED  
3 Did you disclose to Pastor Johnny Hunt, for  
4 example, that you were going to take steps in your  
5 investigation to protect against having a REDACTED  
ED

7 A I did not tell Pastor Johnny Hunt that I  
8 was taking steps to prevent a REDACTED . And I  
9 don't have the context of this document, so I  
10 don't know exactly what we're dealing with right  
11 here because this looks like a response to an  
12 earlier email or a phone call or something.

13 Q Well, you say REDACTED  
14 . You are referring to  
15 REDACTED , right?

16 A Yes. I'm saying that I will call him in  
17 lieu of an email or a text message.

18 Q Because you did not want to have a REDACTED  
D  
19 of this particular communication with REDACTED  
20 REDACTED right?

21 A Putting him in contact with REDACTED  
22 REDACTED had no impact on the investigation.

1 It didn't inform future steps. It didn't prevent  
2 future steps. It didn't prevent Johnny Hunt from  
3 telling us the truth on May 12th. It didn't  
4 prevent Roy Blankenship from talking to us or not  
5 talking to us. It had no impact on the next steps  
6 in the investigation subsequent to April 12th,  
7 2022. And as I told you, I don't know what this  
8 last sentence of the email means.

9 Q But this is a context where you are not  
10 only saying to your colleague, the other lead  
11 investigator, you are REDACTED

15 MR. KLEIN: Objection. Asked and  
16 answered.

17 THE WITNESS: I don't recall that request.  
18 (HOLSKE Exhibit Number 22 was marked for  
19 identification.)

20 BY MR. MACGILL:

21 Q All right. Let's show you another  
22 document.

1 MR. SANDERS: We'll mark as Exhibit 22.  
2 We will show a virtual version, a one-page document,  
3 Bates stamp REDACTED

4 BY MR. MACGILL:

5 Q Sir, do you have Exhibit 22 in front of  
6 you electronically?

7 A I do.

8 Q Is this a text message exchange between  
9 you and REDACTED

10 A Yes.

11 Q And did he write to you a text message  
12 on July 20 at 10:03 a.m. saying: REDACTED

15 Did he write those words to you?

16 A Yes, he did.

17 Q And did he also write in that same text:

18 REDACTED

19 He wrote that to you as well, right?

20 A He did.

21 Q REDACTED

1 REDACTED

2 A No. I have no recollection of him  
3 asking us to REDACTED

5 Q But he did say specifically, sir, RED  
ACT  
ED

9 A Evidently from his text.

10 Q And you responded, you said: REDACTE  
D

14 A Hope you are well. Thank you.

15 Q Now, and you are telling this court and  
16 this jury you don't recall him specifically asking  
17 REDACTED

19 A I have not seen any request. I never  
20 took down any request in writing. I don't have  
21 any emails or text messages asking me to REDACTED

1           Q     Now, sir, we -- we got this from -- we  
2     got this Exhibit 22 from     REDACTED     Do you  
3     understand that?

4           A     If that's what you are telling me.

5           Q     Have you seen this before?

6           A     Have I seen this?   Yes.

7           Q     And you saw it in the ordinary course of  
8     accident?

9                     MR. KLEIN:   Objection as to form.

10                    THE WITNESS:   Yes.

11     BY MR. MACGILL:

12           Q     Yeah.   And that's why you responded to  
13     him, but you didn't recall this until we put it in  
14     front of you, right?

15                    MR. KLEIN:   Objection.   I don't believe  
16     that was his testimony.   I don't think he recalled  
17     it even after seeing it; but his testimony will  
18     control.

19     BY MR. MACGILL:

20           Q     You are saying that you don't remember  
21     ever seeing this document other than when you  
22     responded.

1           A       Other than when I responded?

2           Q       Well, that's a bad question. So you had  
3 no recollection of this coming into today, this  
4 text, Exhibit 21, right?

5           A       Among the documents I reviewed, this was  
6 one among them.

7           Q       You did review this in preparation for  
8 your testimony?

9           A       I did look at this document.

10          Q       When did you review it?

11          A       Sometime between last Thursday and  
12 Tuesday --

13          Q       Okay.

14          A       -- of this week.

15          Q       So, sir, do you have any knowledge as to  
16 why your company did not produce this document to  
17 us?

18          A       You have it.

19          Q       I don't have it from your company. We  
20 got it only from REDACTED . Do you know why your  
21 company did not produce this document to us.

22               MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I don't.

3 BY MR. MACGILL:

4 Q You don't? Now, are you aware of any  
5 directive from the CEO of your company to withhold  
6 documents in this lawsuit?

7 A I was never directed by anybody to  
8 withhold any documents or destroy any documents.

9 Q Around the water cooler, so to speak,  
10 have you had conversations with people about  
11 destroying documents pertaining to this  
12 investigation?

13 A No.

14 Q And you don't recall overhearing anybody  
15 talking about destroying documents associated with  
16 this particular investigation?

17 A Quite to the contrary. We were told to  
18 retain documents with respect to this  
19 investigation.

20 Q When did you get that request?

21 A I don't recall.

22 Q Now, you have the habit of deleting



1 things, right? You know you clear off your email,  
2 you clear off your texts as you testified to  
3 earlier, right?

4 A Correct.

5 Q Did you clear everything out before you  
6 got that litigation hold notice?

7 A If anything had been cleared from my  
8 text, it would have been before the hold notice.  
9 I did not delete anything subsequent to the hold  
10 notice, and anything I deleted prior to the hold  
11 notice would have been in the normal course of my  
12 organizational habits.

13 MR. MACGILL: That's all we have. Thank  
14 you.

15 MR. KLEIN: I have no questions, but I  
16 believe Gretchen may have questions for you.

17 EXAMINATION BY COUNSEL FOR THE EC  
18 BY MS. CALLAS:

19 Q Hi Mr. Holske. Gretchen Callas, counsel  
20 for the executive committee. I want to just be  
21 clear about a couple things you testified earlier,  
22 and this relates to your contact of communications

1 with -- I think it was referred to the SBC.

2 A Yes, ma'am.

3 BY MR. MACGILL:

4 Q So I'm going to go back to earlier in  
5 the day. As you sit here today do you recall --  
6 you, Russell Holske -- having any contact or  
7 communications with a person you understood to be  
8 a representative of the executive committee of the  
9 Southern Baptist Convention?

10 A Only the ones I interviewed, but not  
11 with respect to this matter we're here on today.

12 Q Okay. So not in connection with the  
13 drafting, editing, or finalization of the report?

14 A No. I wasn't in direct contact on any  
15 of that.

16 Q So similarly, do you recall having any  
17 communications or contact with a person you  
18 understood to be a member of the sexual abuse task  
19 force of the Southern Baptist Convention during  
20 the course of your work finalizing or drafting the  
21 report?

22 A No, ma'am.

6 Q Now, we've touch a little bit on the  
7 question you did ask Mr. Hunt in the second  
8 interview, which was May 12th of 2022, correct?

10 Q And you did at that time ask him quite  
11 clearly whether he had had any physical contact  
12 with REDACTED ; is that correct?

14	Q	What was his response?
----	---	------------------------

16 Q At any time in that interview with  
17 Pastor Hunt did he admit to you that he had kissed  
18 REDACTED on the mouth?

20 Q At any time in that second interview did  
21 Pastor Hunt admit to you that he had fondled REDACTED

1           A       No.

2           Q       Did he tell you at that time Pastor Hunt  
3   that    REDACTED       had initiated contact with him?

4           A       No.   When I asked that question he said  
5   no.

6                   MS. CALLAS:   That's all the questions I  
7   have.

8                   MR. KLEIN:   I have no questions.   Thank  
9   you, Mr. Holske.

10                  VIDEOGRAPHER:   This ends the deposition  
11   today.   We're now off the record at 17:41.

12                   (Whereupon, at 5:41 p.m., the deposition  
13   of RUSSELL HOLSKES was concluded.)

14                               \*   \*   \*   \*   \*

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CERTIFICATE OF NOTARY PUBLIC

I, CONSTANCE HUNT RHODES, the officer  
before whom the foregoing deposition was taken, do  
hereby certify that the witness whose testimony  
appears in the foregoing deposition was duly sworn  
by me; that the testimony of said witness was  
taken by me in stenotypy and thereafter reduced to  
typewriting under my direction; that said  
deposition is a true record of the testimony given  
by said witness; that I am neither counsel for,  
related to, nor employed by any of the parties to  
the action in which this deposition was taken; and  
further, that I am not a relative or employee of  
any attorney or counsel employed by the parties  
thereto, nor financially or otherwise interested  
in the outcome of the action.

*Constance Hunt Rhodes*

CONSTANCE HUNT RHODES  
Notary Public in and for  
the District of Columbia

My commission expires:  
January 31, 2028

Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

February 19, 2024

To: SCOTT A. KLEIN

Case Name: Hunt, Johnny M. v. Southern Baptist Convention; Et Al.

Veritext Reference Number: 6438462

Witness: Russell Holske                      Deposition Date: 2/1/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown

above, or email to [production-midwest@veritext.com](mailto:production-midwest@veritext.com).

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6438462

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;  
Et Al.

DATE OF DEPOSITION: 2/1/2024

WITNESS' NAME: Russell Holske

In accordance with the Rules of Civil  
Procedure, I have read the entire transcript of  
my testimony or it has been read to me.

I have made no changes to the testimony  
as transcribed by the court reporter.

\_\_\_\_\_  
Date Russell Holske

Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
the referenced witness did personally appear  
and acknowledge that:

They have read the transcript;

They signed the foregoing Sworn  
Statement; and

Their execution of this Statement is of  
their free act and deed.

I have affixed my name and official seal

this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Commission Expiration Date

DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6438462

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;  
Et Al.

DATE OF DEPOSITION: 2/1/2024

WITNESS' NAME: Russell Holske

In accordance with the Rules of Civil  
Procedure, I have read the entire transcript of  
my testimony or it has been read to me.

I have listed my changes on the attached  
Errata Sheet, listing page and line numbers as  
well as the reason(s) for the change(s).

I request that these changes be entered  
as part of the record of my testimony.

I have executed the Errata Sheet, as well  
as this Certificate, and request and authorize  
that both be appended to the transcript of my  
testimony and be incorporated therein.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Russell Holske

Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
the referenced witness did personally appear  
and acknowledge that:

They have read the transcript;

They have listed all of their corrections  
in the appended Errata Sheet;

They signed the foregoing Sworn  
Statement; and

Their execution of this Statement is of  
their free act and deed.

I have affixed my name and official seal  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Commission Expiration Date



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ERRATA SHEET  
VERITEXT LEGAL SOLUTIONS MIDWEST  
ASSIGNMENT NO: 6438462

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Date Russell Holske  
SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_  
DAY OF \_\_\_\_\_, 20\_\_\_\_ .

-----  
Notary Public

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Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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